

EXHIBIT 11

CONFIDENTIAL

MTPDA CRT Discontinue study List

6/30 2004
revise 8/3 2004

SET Production base

M68LGL061XA		Net half	demand post	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total
27V サウンド	CT-27E13G	\$82	\$78							800	1,000	500	0	1,000	500	425	1,000	1,500	1,500	8,225
	CT-2722HEM	\$82	\$78							800			2,000	1,500		1,000		1,000		6,300
	CT-2788YDM	\$82	\$78							300	250	100	200	200	100	200	200	250		1,800
	CT-2789VYDM	\$82	\$78							350	200	200	200	200	200	100	200	100		1,750
																				0
Total										2,250	1,450	800	2,400	2,900	800	1,725	1,400	2,850	1,500	18,075
8/3 global release base rvice										1,728	2,880	2,880	4,032	2,304	576	1,725	1,400	2,850	1,500	21,875
9/10 global release base rvice												1,728	4,032	2,880	1,728	1,728	1,152			20,723

CONDITION

Final number present Jun/End/2004

M68LGL062XA		Net half	demand post	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total
27V サウンド	CT-G2974J	\$82	\$78							2,586	3,524	3,269	3,450	2,338	2,590	3,820	3,200	2,510		27,287
	CT-G2974LJ	\$82	\$78							624	780	1,842	1,640	780	864	780	1,460	780		9,550
																				0
																				0
										3,210	4,304	5,111	5,090	3,118	3,454	4,600	4,660	3,290	0	36,837
8/3 global release base rvice										1,728	2,304	2,880	4,608	3,456	3,454	4,600	4,660	3,290	0	30,980
9/10 global release base rvice												2,880	5,176	2,304	3,456	4,032				

CONDITION

Final number present Jun/End/2004

M68LZP195X		Net half	demand post	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total
27V フラット	CT-27SL14J	\$94	\$88							23,000	22,610	29,400	26,250	25,500	22,000	16,100	500	25,000	32,000	222,360
	CT-27SL14UJ	\$94	\$88																	0
	CT-27SC14MJ	\$94	\$88							11,047	18,279	15,644								44,970
																				0
										34,047	40,889	45,044	26,250	25,500	22,000	16,100	500	25,000	32,000	267,330
8/3 global release base rvice										40,800	45,600	41,280	26,250	25,500	22,000	16,100	500	25,000	32,000	275,030
9/10 global release base rvice												27,840	24,000	22,080	13,920	11,520				

CONDITION

Rough number present Jul/End/2004
Final number present Sep/End/2004
Final production Dec/End/2004

A90LSW095X		Net half	demand post	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total
36V SST フラット	CT-36SL14J	\$300	\$300							120	115	500	500	483	250	250	100	0	0	2,318
	CT-36HL44J	\$368	\$368							0	550	550	550	355						2,005
																				0
																				0
										120	665	1,050	1,050	838	250	250	100	0	0	4,323
8/3 global release base rvice										120	665	1,050	1,050	838	250	250	100	0	0	4,323
9/10 global release base rvice												228	744	912	228	456				

CONDITION

Rough number present Jul/End/2004
Final number present Sep/End/2004
Final production Dec/End/2004

M80LSW095X		Net half	demand post	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	Total
32V SST フラット	CT-32HC14J	\$222	\$210							621	548	596	741	999	0	500	0	2,000	2,000	8,005
	CT-32HC14UJ	\$222	\$210																	0
	CT-32HL44J	\$222	\$210							248	971	800	1,207	831	600	200	0	1,000	1,000	6,857
	CT-32HL44UJ	\$222	\$210																	0
	CT-32HXC14J	\$222	\$210							4,000	2,565	3,396	3,200	2,683	1,500	100	0	4,000	2,000	23,444
	CT-32SC14J	\$200	\$190							800	2,322	2,390	2,450	4,050	1,050	1,000	0	3,500	2,000	19,562
	CT-32SL14J	\$180	\$170							3,850	9,394	9,250	9,100	10,256	11,000	5,650	350	1,000	2,000	61,850
CT-F3444XJ		\$200	\$190							320	370	400	650	500	400	200	300	600	500	4,240

CONDITION

Rough number present Jul/End/2004
Final number present Sep/End/2004
Final production Dec/End/2004

																					0
										9,839	16,170	16,832	17,348	19,319	14,550	7,650	650	12,100	9,500	123,958	
	8/3 global release base rivice									9,839	16,170	16,832	17,348	19,319	14,550	7,650	650	12,100	9,500	123,958	
	9/10 global release base rivice											13,464	17,952	16,896	15,084	8,976					

2004 8/3 PVCA chenge quantity yellow sell data.

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EXHIBIT 12

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION)
)
)
_____) Case No. 07-5944 SC
)
This Document Relates to:) MDL No. 1917
)
ALL ACTIONS)
_____)

Videotaped deposition of DANIEL RIEBOW, taken
on behalf of the Defendants, at 820 Mililani Street,
Suite 701, Honolulu, Hawaii, beginning at 10:06 a.m.
and ending at 12:59 p.m., on Tuesday, April 17, 2012,
before JOANNA B. BROWN, Certified Shorthand Reporter
No. 8570.

1 A I believe it was three years.

2 Q How long have you lived in Honolulu all total,
3 continuously?

4 A Thirty-three years.

10:12 5 Q Do you have any plans to move away from
6 Hawaii?

7 A I do not.

8 Q Do you own a car?

9 A Yes, I do.

10:12 10 Q Is it registered in Hawaii?

11 A Yes, it is.

12 Q Do you pay taxes in Hawaii?

13 A Yes, I do.

14 Q Do you pay taxes in any other state?

10:12 15 A No, I do not.

16 Q Are you registered to vote?

17 A Yes, I am.

18 Q Are you registered in Hawaii?

19 A Yes, I am.

10:12 20 Q Are you registered to vote in any other state?

21 A No.

22 Q Can you just give me a thumbnail sketch of
23 your educational background?

24 A I have a two-year degree and probably an equal
10:13 25 number of credits beyond that but no degree.

EXHIBIT 13

Produced on 9/7/11

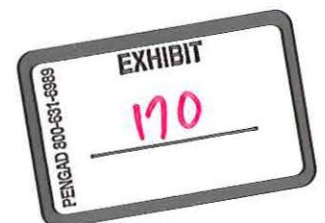
SAMSUNG EXHIBIT A10

PLAINTIFF TRAVIS BURAU

Travis Burau
6803 Inwood Lane NE
Cedar Rapids, IA 52402

David Syrios
ADEMI & O'REILLY
3620 East Layton Ave.
Cudahy, WI 53110

Robert J. Gralewski, Jr.
KIRBY McINERNEY LLP
825 Third Avenue
New York, NY 10022



Produced on 9/7/11

SAMSUNG EXHIBIT B10

PLAINTIFF TRAVIS BURAU

1. **CRT PRODUCT:** TruTech television
2. **DATE OF PURCHASE:** Approximately 2006
3. **LOCATION of PURCHASE:** Target - Cedar Rapids, IA
4. **PERSONS INVOLVED IN PURCHASE:** Travis Burau (plaintiff)
5. **PRICE:** \$200 (approximately)
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000372.

Produced on 9/7/11

SAMSUNG EXHIBIT D10

PLAINTIFF TRAVIS BURAU

CRTs: Mr. Burau does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Burau has reviewed advertisements in the Cedar Rapids Gazette for CRT products. He also believes he probably reviewed other advertisements for CRT products in various newspapers and online during the relevant time period. Mr. Burau does not have specific recollection of the contents of any of the advertisements he saw.

Produced on 9/7/11

SAMSUNG EXHIBIT E10

PLAINTIFF TRAVIS BURAU

Mr. Burau purchased a Dell Flat Screen Monitor during the relevant time period. He purchased the Flat Screen Monitor because it was an upgrade as part of a computer package purchased from Dell. Mr. Burau may have purchased other non-CRT televisions or computer monitors during the relevant time period, but cannot state with certainty.



CRT000372

EXHIBIT 14

EXHIBIT 15

10:11:09 1 A. The TruTech.

10:11:14 2 Q. And that was a television or monitor?

10:11:16 3 A. A television.

10:11:16 4 Q. And approximately when did you purchase that
10:11:19 5 TruTech television?

10:11:20 6 A. It was in 2006.

10:11:22 7 Q. Okay. Did you ever resell any of the products
10:11:25 8 that you purchased containing a CRT?

10:11:29 9 A. I don't think I've ever sold one, no. I've
10:11:33 10 given them away before.

10:11:36 11 Q. So the TruTech television that you purchased
10:11:38 12 that's the subject of your claims, what size screen,
10:11:42 13 approximately, is that television?

10:11:43 14 A. I believe it's a 13-inch, but that's -- could
10:11:47 15 be smaller.

10:11:48 16 Q. Okay. And where did you purchase that
10:11:52 17 television?

10:11:53 18 A. At Target.

10:11:55 19 Q. And where was that Target located?

10:11:58 20 A. In Cedar Rapids, Iowa.

10:12:00 21 Q. Do you remember approximately when you
10:12:01 22 purchased that TV?

10:12:03 23 A. Spring/summertime of 2006.

10:12:13 24 Q. Were you living in Cedar Rapids, Iowa, at the
10:12:17 25 time you purchased it?

10:12:18 1

A. Yes.

10:12:21 2

Q. And why did you purchase the television?

10:12:24 3

A. Just for an extra television for a spare

10:12:27 4

bedroom.

10:12:27 5

Q. You use it in your home?

10:12:29 6

A. Yes.

10:12:31 7

Q. How much did you pay for that television?

10:12:33 8

A. Around \$200.

10:12:36 9

Q. Did you keep the receipt for that television

10:12:41 10

purchase?

10:12:41 11

A. No, I did not.

10:12:43 12

Q. Okay. So is it fair to say that you don't know

10:12:46 13

the exact price of what you paid for the TruTech

10:12:49 14

television?

10:12:50 15

A. No. It would be within -- like \$20 of \$200.

10:12:56 16

Q. So it's possible it was a little bit more, a

10:12:59 17

little bit less than --

10:13:00 18

A. Yes.

10:13:01 19

Q. -- \$200?

10:13:02 20

A. Yes.

10:13:03 21

Q. How did you pay for that television?

10:13:05 22

A. Cash. I should say I'm pretty sure cash,

10:13:09 23

either that or my debit card.

10:13:12 24

Q. But do you remember when you lost the receipt

10:13:15 25

or got rid of the receipt for the television?

10:14:32 1 was \$200. It wouldn't have stuck out because in Iowa
10:14:38 2 you either shop at Target or Walmart so it wouldn't have
10:14:41 3 been --

10:14:41 4 Q. So just to make sure I understand, you didn't
10:14:44 5 ask Alliant Credit Union for your bank statements from
10:14:48 6 the 2006 time period to see if you could find a Target
10:14:50 7 purchase --

10:14:50 8 A. Yeah. That's correct. I didn't think it would
10:14:52 9 help.

10:14:52 10 Q. How did you receive your statements from
10:14:55 11 Alliant Credit Union about the time that you purchased
10:14:58 12 this product? Were they by -- in paper or online?

10:15:03 13 A. I believe it was paper at the time.

10:15:07 14 Q. Do you keep your statements?

10:15:09 15 A. No, I don't.

10:15:10 16 Q. Do you have any documentation that can indicate
10:15:31 17 that you purchased this product in the spring or summer
10:15:35 18 of 2006?

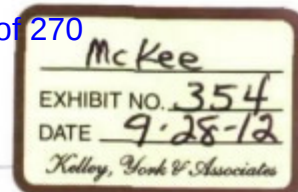
10:15:38 19 A. No, other than I'm -- I'm confident that's when
10:15:42 20 I purchased it.

10:15:43 21 Q. And why are you confident about that?

10:15:45 22 A. It was the same year that my kids were born.
10:15:50 23 It was before they were born, that year, so . . .

10:16:00 24 Q. Okay. Did you pay any sales tax or any other
10:16:05 25 kind of tax on the purchase of the TruTech television?

EXHIBIT 16



Produced on 9/20/12

SAMSUNG EXHIBIT B11 (AMENDED)**PLAINTIFF SOUTHERN OFFICE SUPPLY****1. CRT PRODUCT:**

- a. AOC computer monitor; Model No. 7V1r; Serial No. N7DNO7G638285 (manufactured July 2000)
- b. GEM computer monitor; Serial No. GRNAM94329767 (manufactured October 1999)
- c. AOC Elr computer monitor; Serial No. C3CJ2AB221560
- d. AOC 7V1r computer monitor; Serial No. ACJ084706502 (manufactured November 1998)
- e. Computer monitor (unknown brand); Model No. D1770; Serial No. C3GN24B113273
- f. Computer monitor Model No. BTCO177K; Serial No. 8910002454 (manufactured March 1999)
- g. Digiview computer monitor; Model No. HR-1434-SINM34AFA63X03 (manufactured November 1996)
- h. AOC computer monitor; Model No. 7 Elr; Serial No. C3CJ410797076
- i. AOC computer monitor; Model No. 7 Elr; Serial No. 7TDN16C631909 (manufactured June 2001)
- j. Impression 5 Plus computer monitor; Model No. DA-1565; Serial No. BBK743C0030794

2. DATE OF PURCHASE:

Plaintiff possesses 7 invoices noting purchases of CRT monitors during the class period. These invoices show purchase dates as follows:

- a. 2/02/2000
- b. 3/17/2000
- c. 3/31/2000
- d. 5/22/2000
- e. 11/16/2000
- f. 2/13/2003
- g. 4/24/2003

In some cases the invoices do not provide enough information to definitively state that they are associated with certain monitors listed in No. 1 above.

Produced on 9/20/12

3. LOCATION of PURCHASE: All computer monitors were purchased from Elite Technology, Inc. in Kansas City, Kansas.

4. PERSONS INVOLVED IN PURCHASE: Tony McKee (owner of Southern Office Supply)

5. PRICE: The 7 invoices possessed by Plaintiff show CRT monitor purchases in the following amounts during the class period.

- a. \$183.00
- b. \$189.00
- c. \$189.00
- d. \$181.00
- e. \$163.00
- f. \$119.00
- g. \$98.00

6. TAXES/FEES: There were no taxes or fees applied to any purchase of the computer monitors. Freight charges were paid COD.

7. BUNDLE: One computer monitor was purchased as part of a bundle, but Plaintiff cannot recall with certainty which one it was. All other computer monitors were purchased separately and not as part of a bundle or system.

8. WARRANTIES: All parts had a one-year warranty except CPU parts had a 25-day warranty excluding physical damage.

9. PURPOSE of PURCHASE: Use within business and not for resale.

See also CRT000222-238.

EXHIBIT 17

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

)
)No. 07-5944-SC
)MDL No. 1917
)
)
)Judge: Hon. Samuel
)Conti
)
)Special Master:
)Hon. Charles A. Legge
) (Ret.)
)
)

This Document Relates to:

INDIRECT PURCHASER ACTIONS

D E P O S I T I O N

The videotape deposition of TONY McKEE taken on
behalf of the Defendants pursuant to the Federal Rules of
Civil Procedure before:

RICK, J. FLORES, CSR
KELLEY, YORK & ASSOCIATES, LTD.
515 South Main, Suite 105
Wichita, KS 67202

a Certified Shorthand Reporter of Kansas, at 419 North
Kansas Avenue, Liberal, Seward County, Kansas, on the
28th day of September, 2012, at 10:17 a.m.

1 Q. How many employees work for Southern?

2 A. Twenty.

3 Q. Which of those employees is involved in the
4 purchase, sale or use of cathode ray tube
5 products?

6 A. Eighteen.

7 Q. And those 18 employees, what responsibilities
8 do they have with respect to the purchase,
9 sale or use of cathode ray tube products?

10 A. I would say of the 18, 16 of them are users
11 and two of us are purchasers.

12 Q. Who are the two purchasers?

13 A. It'd be myself and Eric Mitchell.

14 Q. And what is Eric Mitchell's title?

15 A. He is the service manager.

16 Q. And what is your title?

17 A. President.

18 Q. How many locations does Southern have?

19 A. Two.

20 Q. Where are those locations?

21 A. Liberal, Kansas; Guymon, Oklahoma.

22 Q. Where is your corporate headquarters?

23 A. Liberal, Kansas.

24 Q. In what state are you incorporated?

25 A. Kansas.

1 A. No.

2 Q. Back to CRT product 1.J. When did you
3 purchase this Impression monitor?

4 A. I do not have that.

5 Q. Where did you buy this monitor, CRT product
6 1.J?

7 A. From Elite Technologies.

8 Q. Did you buy all 10 monitors in Exhibit 354
9 from Elite Technology?

10 A. I believe that's correct.

11 Q. Do you know how much you paid for CRT product
12 1.J?

13 A. No, sir.

14 Q. Do you have a receipt for the purchase of CRT
15 product 1.J?

16 A. No, sir.

17 Q. If you turn back to Exhibit 354, which is the
18 list of the CRT products for which you are
19 claiming damages, there are seven other
20 monitors listed that we haven't yet
21 discussed; is that correct?

22 A. Yes, sir.

23 Q. That's CRT product 1.B, 1.C, 1.E, 1.F, 1.G,
24 1.H and 1.I; correct?

25 A. Yes.

1 Q. And which of these monitors was there a
2 promotion for? And when I say these
3 monitors, I mean those on Exhibit 354.

4 A. No.

5 Q. So when you said yes, what were you referring
6 to?

7 A. The one that's not on the list that we
8 received when we bought a system for \$100.

9 Q. And you are not claiming damages in this case
10 for that one?

11 A. It is not on this list.

12 Q. So you're not claiming damages in this case
13 for that one?

14 A. No.

15 Q. Was there a rebate for any of the products on
16 Exhibit 354?

17 A. No.

18 Q. Were the monitors you purchased here, as far
19 as you know, new monitors?

20 A. Yes.

21 Q. Was any of these monitors a display model or
22 a floor model?

23 A. No.

24 Q. Did you have the products delivered to
25 Southern?

1 A. Yes.

2 Q. And were they shipped directly here to you?

3 A. Yes.

4 Q. And where were they shipped from?

5 A. Kansas City.

6 Q. And who paid for the shipping?

7 A. I did.

8 Q. And how much did you pay?

9 A. Varying amounts.

10 Q. Are those amounts listed on the invoices that
11 you have --

12 A. No, sir.

13 Q. -- produced? Is there evidence in anything
14 that you've produced showing the shipping
15 amounts?

16 A. Yes, sir.

17 Q. Okay. Did the price that you paid for each
18 monitor --

19 MR. GRALEWSKI: Counsel?

20 MR. HEIN: Yes.

21 MR. GRALEWSKI: Are you finished
22 with your answer?

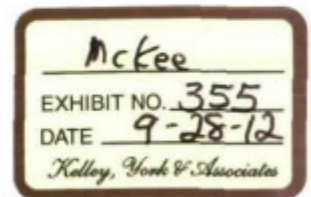
23 A. No, because it appears sometimes I did pay
24 the shipping.

25 MR. GRALEWSKI: Is it okay if he

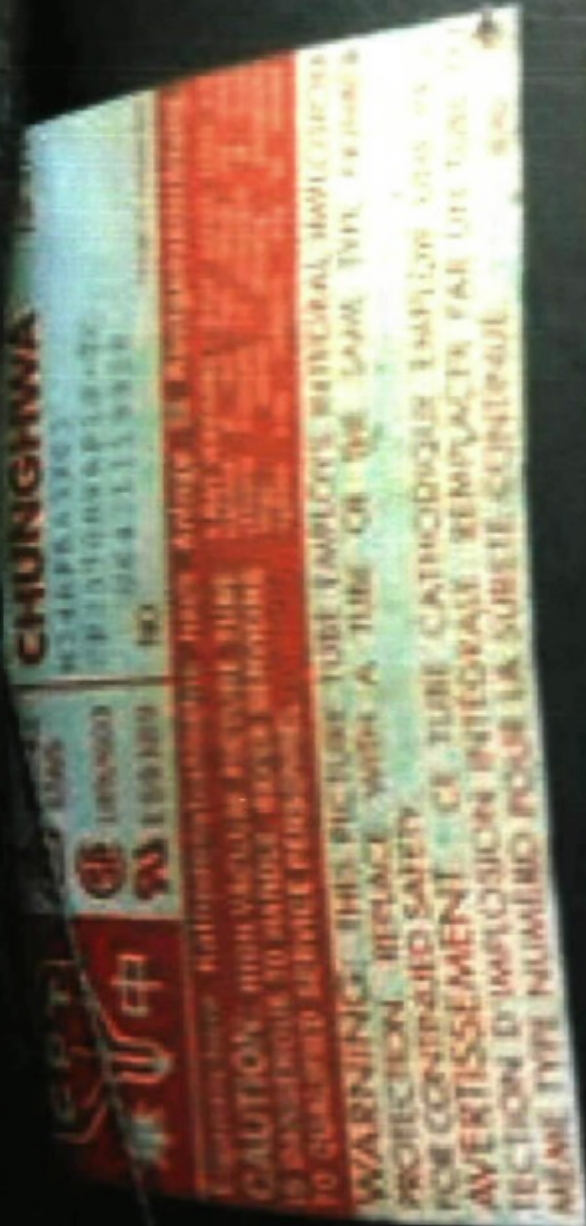
EXHIBIT 18

Hein, Patrick

From: Bob Gralewski <bgralewski@kmlip.com>
Sent: Monday, September 24, 2012 3:21 PM
To: Hein, Patrick
Subject: Photos from CRT Product 1.a.
Attachments: IMG_2501.JPG; IMG_2502.JPG







Hein, Patrick


From: Bob Gralewski <bgralewski@kmlp.com>
Sent: Monday, September 24, 2012 3:23 PM
To: Hein, Patrick
Subject: Photos from CRT Product 1.d.
Attachments: IMG_2495.JPG; IMG_2496.JPG; IMG_2497.JPG



Hein, Patrick

From: Bob Gralewski <bgralewski@kmlp.com>
Sent: Monday, September 24, 2012 3:24 PM
To: Hein, Patrick
Subject: Photos from CRT Product 1.j.
Attachments: IMG_2498.JPG; IMG_2499.JPG; IMG_2500.JPG



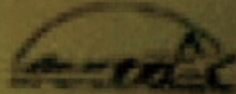
 *mpression® 5 Plus*

Impression 5 Plus

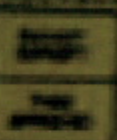
Model No. DA-1545

100-240V ~

2.5A 50-60Hz



RBK74300



LISTED
ON 12
CLASS
MONITOR



LA105273

E124786



FCC ID: H79DA-1545

Entspricht der RGV vom 08.01.1987

Funkentstört nach BPT-Vertrag Vfg 240/1991

THIS DEVICE COMPLIES WITH PART 15 OF THE FCC RULES. OPERATION IS SUBJECT TO THE FOLLOWING TWO CONDITIONS:

(1) THIS DEVICE MAY NOT CAUSE HARMFUL INTERFERENCE, AND

(2) THIS DEVICE MUST ACCEPT ANY INTERFERENCE RECEIVED

INCLUDING INTERFERENCE THAT MAY CAUSE UNDESIRABLE OPERATION.

THIS PRODUCT COMPLIES WITH CEAS RULES-2006-Subchapter J.

Die in diesem Gerät enthaltene Antenne ist eine

Beschränkungsgeschwindigkeit Beschleunigungsgrenzung maximal 25.0m/s

CAUTION: CONTAINS HAZARDOUS VOLTAGES.

NO USER-SERVICEABLE PARTS INSIDE.

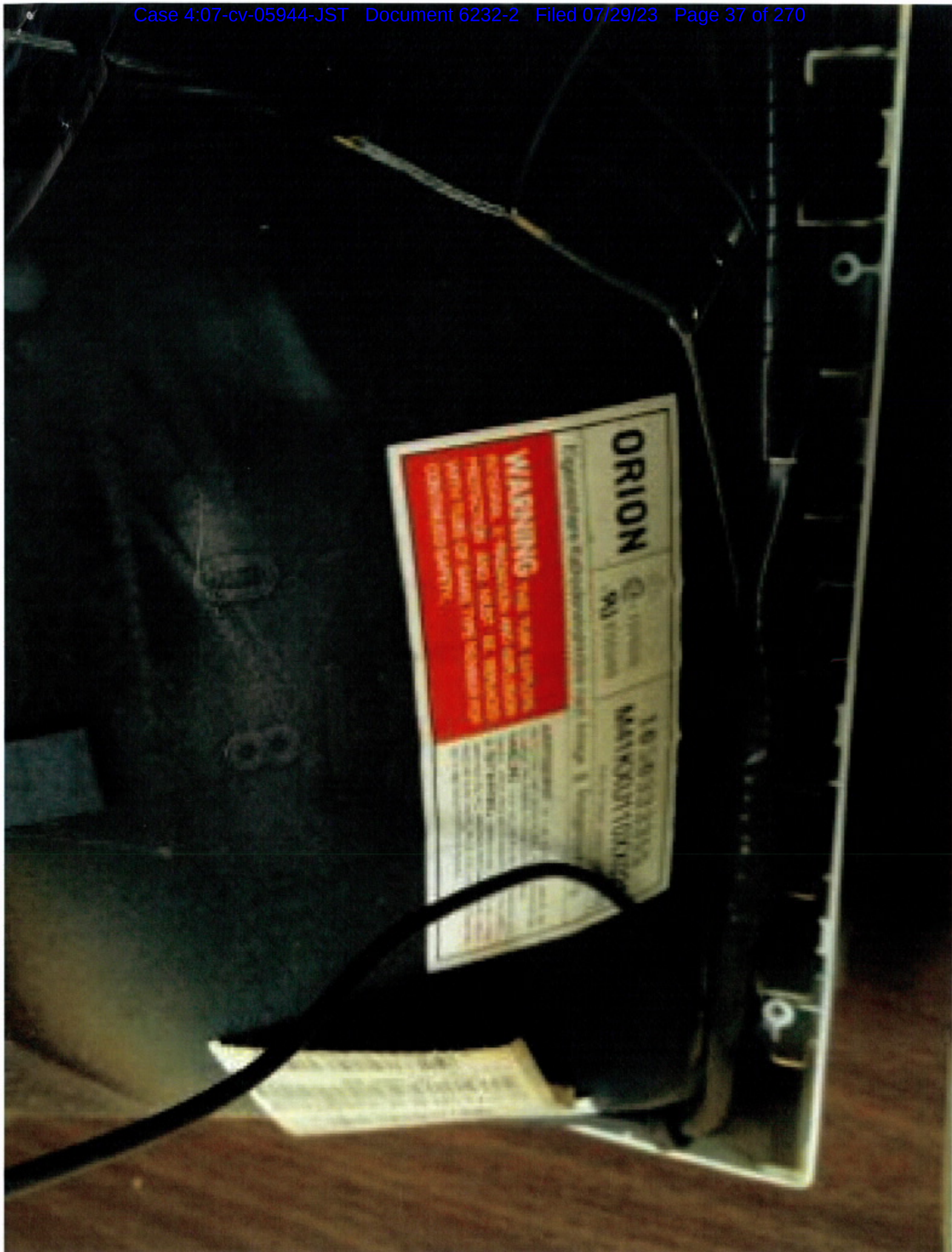
2000 LAURELVIEW COURT, FREMONT, CA 94538

MADE IN THAILAND



S/N RBK7430000794

MODEL DA-1545
PARTS LISTED
DATE 1/1/01
S/N RBK7430000794



ORION

WARNING This unit contains
a lithium-ion battery. Do not
disassemble, modify, or use
the unit in a way not intended
by the manufacturer. Do not
expose the unit to fire or
excessive heat. Do not
dispose of the unit in a fire.
Consult the user manual for
proper disposal.

Q
90

1.8 x 0.3 x 0.3
MAKING YOUR LIFE EASIER

EXHIBIT 19

Produced on 9/7/11

SAMSUNG EXHIBIT B26

PLAINTIFF BEDROCK MANAGEMENT

1. **CRT PRODUCT:** Dell 17-inch E773c Monitor
2. **DATE OF PURCHASE:** 9/3/03
3. **LOCATION of PURCHASE:** Dell
4. **PERSONS INVOLVED IN PURCHASE:** Curtis Large
5. **PRICE:** \$801.00 (including computer and other items)
6. **TAXES/FEES:** \$46.06 (on price of entire computer and other items)
7. **BUNDLE:** The computer monitor was purchased as part of a system.
8. **WARRANTIES:** The computer bundle had a 2 year limited warranty. There was a \$100 rebate on the system, but it is unclear whether or not the business took advantage of this rebate.
9. **PURPOSE of PURCHASE:** Use within business and not for resale.

See also CRT000373-374.

Produced on 9/7/11

SAMSUNG EXHIBIT B27

PLAINTIFF KERRY LEE HALL

1. **CRT PRODUCT:** Sears Home Central Series LXI 13" Color Television
2. **DATE OF PURCHASE:** 3/25/2001
3. **LOCATION of PURCHASE:** Sears - Scarborough, Maine
4. **PERSONS INVOLVED IN PURCHASE:** Kerry Lee Hall (plaintiff)
5. **PRICE:** \$79.88
6. **TAXES/FEES:** \$3.99
7. **BUNDLE:** Not purchased as part of a bundle or system.
8. **WARRANTIES:** Full 90 day warranty from date of purchase; free repairs for defective workmanship and free replacement for defective parts within one year of purchase.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000508-512.

Produced on 9/7/11

SAMSUNG EXHIBIT B28

PLAINTIFF LISA REYNOLDS

1. **CRT PRODUCT:** 3 JVC Color Televisions
2. **DATE OF PURCHASE:** While each was purchased during the class period, the specific purchase date is unknown for two of the televisions. One was purchased on 11/17/00.
3. **LOCATION of PURCHASE:** All were purchased at ABC Warehouse, 3830 28th Street SE, Kentwood, MI 49512
4. **PERSONS INVOLVED IN PURCHASES:** Lisa Reynolds (plaintiff)
5. **PRICE:** Not available for two; \$356.03 (including tax) for one
6. **TAXES/FEES:** The standard sales tax was applied to the purchases of the televisions.
7. **BUNDLE:** None of the televisions were purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000518-524.

Produced on 9/7/11

SAMSUNG EXHIBIT B29

PLAINTIFF BARRY KUSHNER

1. **CRT PRODUCT:**
 - a. Philips – Magnavox Television
 - b. Toshiba Television
2. **DATE OF PURCHASE:**
 - a. 3/22/00
 - b. 1995
3. **LOCATION of PURCHASE:**
 - a. Best Buy – Inver Grove Heights, Minnesota
 - b. Plaintiff purchased from a retailer whose name he does not recall; retailer is out of business
4. **PERSONS INVOLVED IN PURCHASES:** Barry Kushner (plaintiff)
5. **PRICE:**
 - a. \$297.97
 - b. Not available.
6. **TAXES/FEES:**
 - a. \$18.20
 - b. The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** Neither television was purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000381-418.

Produced on 9/7/11

SAMSUNG EXHIBIT B30

PLAINTIFF CONRAD CARTY

1. **CRT PRODUCT:**
 - a. Samsung 42" television – S/N: HS4255WX/XAA
 - b. Daewoo 19" television
2. **DATE OF PURCHASE:**
 - a. 9/2006
 - b. 12/2006
3. **LOCATION of PURCHASE:**
 - a. Best Buy – Middletown, NY
 - b. Shop Rite – Chester, NY
4. **PERSONS INVOLVED IN PURCHASE:** Conrad Carty (plaintiff)
5. **PRICE:**
 - a. \$1,200
 - b. \$179.00
6. **TAXES/FEES:** The standard sales tax was applied to the purchases of the televisions.
7. **BUNDLE:** Neither television was purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000375-380.

Produced on 9/7/11

SAMSUNG EXHIBIT B31

PLAINTIFF JANET ACKERMAN

1. **CRT PRODUCT:** Toshiba Television 26HF85
2. **DATE OF PURCHASE:** 10/17/2005
3. **LOCATION of PURCHASE:** P.C. Richard & Son - Ralph Avenue Store #35 - Brooklyn, N.Y.
4. **PERSONS INVOLVED IN PURCHASE:** Janet Ackerman (plaintiff)
5. **PRICE:** \$426.97
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000506-507.

Produced on 9/7/11

SAMSUNG EXHIBIT B32

PLAINTIFF STEVEN HAWLEY

1. CRT PRODUCT:

- a. GE Television – S/N: 634273799
- b. GE Television – Model Number 19GT243
- c. Dell Computer Monitor – Model Number M781s
- d. Samsung Television – S/N: 39153CDY500057P
- e. Samsung Television – S/N: B18L3CCL300900R

2. DATE OF PURCHASE:

- a. 1997
- b. 2002
- c. 2002
- d. 2005
- e. 2006

3. LOCATION of PURCHASE:

- a. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- b. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- c. Dell
- d. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- e. Circuit City, 9565 South Boulevard, Charlotte, NC 28273

4. PERSONS INVOLVED IN PURCHASE: Steven Hawley (plaintiff)

5. PRICE: Not available.

6. TAXES/FEES: The standard sales tax was applied to all purchases.

7. BUNDLE:

- a. Not purchased as part of a bundle or system.
- b. Not purchased as part of a bundle or system.
- c. Was purchased as part of a bundle or system.
- d. Not purchased as part of a bundle or system.
- e. Not purchased as part of a bundle or system.

8. WARRANTIES: None other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000513-517.

SEARS
RETAIL DEALER
SEARS AUTH DEALER, NE 03644



RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

SALESCHECK #
036449013152

CUSTOMER: KERRY HALL

TRAN# PG/STORE REG# ASSOC#
3152 10 03644 901 1198

SALE

57 43010 TV 13" LXI SAL 79.88T
SUBTOTAL 79.88
TAX 05.000% 3.99

CARD TYPE: VISA

ACCT #: W5845

AUTH CODE: 055536-E

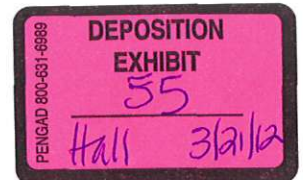
03/25/01 VISA TOTAL 83.87

CARDHOLDER ACKNOWLEDGES RECEIPT
OF GOODS AND/OR SERVICES IN THE
AMOUNT OF
\$83.87

AND AGREES TO PERFORM THE
OBLIGATIONS SET FORTH IN THE
CARDHOLDER'S AGREEMENT WITH THE
ISSUER IDENTIFIED HEREON.

PURCHASED BY

SATISFACTION GUARANTEED
OR YOUR MONEY BACK
PLEASE RETAIN THIS RECEIPT TO
RECEIVE A REFUND IN THE FORM OF YOUR
ORIGINAL PAYMENT



CRT000512

Produced on 9/7/11

SAMSUNG EXHIBIT A26

PLAINTIFF BEDROCK MANAGEMENT COMPANY, INC.

Curtis Large
4830 V St Nw #3
Washington, DC 20007

Paul Sullivan, Esq.
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950 Winter Street, Suite 1300
Waltham, MA 02451

Robert J. Gralewski, Jr.
KIRBY McINERNEY LLP
825 Third Avenue
New York, NY 10022



Produced on 9/7/11

SAMSUNG EXHIBIT A27

PLAINTIFF KERRY LEE HALL

Kerry Lee Hall
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Scarborough, ME 04074

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825 Third Avenue
New York, NY 10022

Produced on 9/7/11

SAMSUNG EXHIBIT A28

PLAINTIFF LISA REYNOLDS

Lisa Reynolds
4051 Shannon St. NW
Walker, MI 49534

Keith Essenmacher
LOVELL, STEWART, HALEBIAN & JACOBSON, LLP
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New York, NY 10006

Robert J. Gralewski, Jr.
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825 Third Avenue
New York, NY 10022

Produced on 9/7/11

SAMSUNG EXHIBIT A29

PLAINTIFF BARRY KUSHNER

Barry Kushner
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Mendot Heights, MN 55120

Daniel R. Karon, Esq.
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Produced on 9/7/11

SAMSUNG EXHIBIT A30

PLAINTIFF CONRAD CARTY

Conrad Carty
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Warwick, NY 10990

Jody Krisiloff, Esq.
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New York, NY 10022

Produced on 9/7/11

SAMSUNG EXHIBIT A31

PLAINTIFF JANET ACKERMAN

Janet Ackerman
2680 East 66 Street
Brooklyn, NY 11234

Brian Barry, Esq.
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Los Angeles, CA 90067

Robert J. Gralewski, Jr.
KIRBY McINERNEY LLP
825 Third Avenue
New York, NY 10022

Produced on 9/7/11

SAMSUNG EXHIBIT A32

PLAINTIFF STEVEN HAWLEY

Steven Hawley

James F. Wyatt, III, Esq.
2124 Park Road
Charlotte, North Carolina 28202

Robert J. Gralewski, Jr.
KIRBY McINERNEY LLP
825 Third Avenue
New York, NY 10022

EXHIBIT 20

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

---o0o---

In Re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION,)
)
Plaintiff,)

Case No.
07-5944 Sc
MDL No. 1917

_____)
This Document Relates to:)
)
ALL ACTIONS,)

_____)
VIDEOTAPED DEPOSITION OF KERRY LEE HALL
WEDNESDAY, MARCH 21, 2012

REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 technical support?

2 A. No.

3 Q. Did you receive any future discounts?

4 A. No.

11:59 5 Q. Okay. You got a power cord?

6 A. Yes.

7 Q. Do you remember receiving anything else
8 with your television?

9 A. No.

11:59 10 Q. Did you get -- did you have Sears ship it,
11 or did you take it with you?

12 A. Took it with us.

13 Q. Did you purchase this television with
14 any -- along with any other products or services,
12:00 15 like a VCR or DVD player?

16 A. No.

17 Q. What state were you in when you purchased
18 this product?

19 A. Maine.

12:00 20 Q. Is that where you lived at the time?

21 A. Yes.

22 Q. And you used the television for your
23 personal use?

24 A. Correct.

12:00 25 Q. And where have you used this -- the

1 A. Yes, I do.

2 Q. Okay. Is the information that's listed on
3 this page fully responsive and accurate regarding
4 Interrogatory No. 3, which is on Page 7 of Exhibit
01:56 5 27?

6 MR. GRALEWSKI: Object to the form.

7 Compound.

8 You can answer.

9 THE WITNESS: No. 3 on Page 2 of

01:56 10 exhibit --

11 Q. BY MR. FOSTER: No. 3 on Page 7 of Exhibit
12 27?

13 A. Oh, okay. So could you give me the point
14 of reference again?

01:56 15 Q. Sure. Page 7 --

16 A. Yeah.

17 Q. -- Interrogatory No. 3.

18 A. Uh-huh.

19 Q. And then if you look at the response, it
01:56 20 refers to Samsung Exhibit B26 through B32.

21 So I'm asking you, reading Interrogatory
22 No. 3 --

23 A. Uh-huh.

24 Q. -- is the information that's listed on
01:56 25 Page 2 of Exhibit 28 --

1 A. Uh-huh.

2 Q. -- fully responsive and accurate to

3 Interrogatory No. 3?

4 A. No.

01:57 5 Q. What is not accurate or not responsive?

6 A. I believe there's an oversight here as far

7 as Question No. 3, location of purchase. Yes, it

8 was at Sears. Yes, it was in Maine, but it is

9 Belfast instead of Scarborough.

01:57 10 Q. Okay. So you're referring to Page 2 of

11 Exhibit 28, correct?

12 A. Correct.

13 Q. And that's Belfast?

14 A. Belfast.

01:57 15 Q. Okay.

16 A. And Question No. 4, my husband was with me

17 at the time of the purchase.

18 Q. So you're saying No. 4 on that same page?

19 A. Correct.

01:57 20 Q. Okay. What's your husband's name?

21 A. Thomas.

22 Q. And his last name is Hall also?

23 A. Hall, correct.

24 Q. Is there any other information listed on

01:58 25 Page 2 that's inaccurate or incomplete?

1 A. No, the rest appears correct.

2 Q. When you say that your husband was
3 involved in the purchase --

4 A. Uh-huh.

01:58 5 Q. -- how was he involved?

6 A. In the decision of which TV to purchase.

7 Q. How was he involved in the decision?

8 A. I think we -- you know, we viewed what was
9 there on the shelves and made a decision between
01:58 10 the two of us based on the items stated before.

11 Q. So it would be fair to say that you
12 jointly decided to purchase this television?

13 A. Correct.

14 Q. How was the decision made that you -- you
01:59 15 would purchase the television instead of him?

16 A. That I paid for the --

17 Q. Right, I'm sorry, that you paid for the
18 television.

19 A. I think logistically he carried it out,
01:59 20 and I went to the counter.

21 Q. Okay. Would you say that you jointly
22 purchased the television?

23 MR. GRALEWSKI: Object to the form. Calls
24 for a legal conclusion.

02:00 25 Q. BY MR. FOSTER: You can answer.

EXHIBIT 21

Produced on 9/7/11

SAMSUNG EXHIBIT E26

PLAINTIFF BEDROCK MANAGEMENT

Response pending.

Produced on 9/7/11

SAMSUNG EXHIBIT E27

PLAINTIFF KERRY LEE HALL

Ms. Hall acquired an Acer 20" LCD computer monitor and a Samsung 42" LCD television during the relevant time period because she believed the LCDs looked better than the CRTs and the price point worked for her.

Produced on 9/7/11

SAMSUNG EXHIBIT E28

PLAINTIFF LISA REYNOLDS

Ms. Reynolds did not purchase a non-CRT television or computer monitor during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT E29

PLAINTIFF BARRY KUSHNER

Mr. Kushner purchased a small LCD television in March 2007 for his kitchen counter. He purchased it because it was on sale and, at the time, he thought the technology was better than plasma technology.

Produced on 9/7/11

SAMSUNG EXHIBIT E30

PLAINTIFF CONRAD CARTY

Response pending.

Produced on 9/7/11

SAMSUNG EXHIBIT E31

PLAINTIFF JANET ACKERMAN

Ms. Ackerman purchased an LCD television in either 2005 or 2006 because she wanted to buy a DVD player and the LCD television she purchased had one built-in. Ms. Ackerman also purchased the LCD television, in part, on the recommendation of store personnel.

Produced on 9/7/11

SAMSUNG EXHIBIT E32

PLAINTIFF STEVE HAWLEY

Mr. Hawley did not purchase a non-CRT television or computer monitor during the relevant time period.

EXHIBIT 22

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 ---o0o---

5
6 In Re: CATHODE RAY TUBE (CRT))
7 ANTITRUST LITIGATION,)
8 Plaintiff,)

Case No.
07-5944 SC
MDL No. 1917

9 This Document Relates to:)
10 ALL ACTIONS,)
11

12
13
14
15
16
17 VIDEOTAPED DEPOSITION OF LISA REYNOLDS

18 FRIDAY, APRIL 13, 2012
19
20
21
22
23
24

25 REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 Inc., which I am going to refer to as "SEA."

2 Will you go ahead and state and spell your
3 name for the record.

4 A. My name is Lisa Reynolds, L-i-s-a,
09:07 5 R-e-y-n-o-l-d-s.

6 Q. Okay. And Ms. Reynolds, what's your
7 current home address?

8 A. It's 4051 Shannon Street Northwest,
9 Walker, Michigan 49534.

09:07 10 Q. And how long have you lived at that place
11 of residence?

12 A. Twelve years.

13 Q. Twelve years. And do you rent or own the
14 home?

09:08 15 A. We own the home.

16 Q. You own the home. And is it your primary
17 residence?

18 A. Yes.

19 Q. And where did you live before that?

09:08 20 A. In Grand Rapids, 1034 Richmond Street
21 Northwest.

22 Q. And how long did you live there?

23 A. Five years.

24 Q. And how long have you lived continuously
09:08 25 in Michigan?

1 A. My entire life.

2 Q. Okay. And do you pay taxes in Michigan?

3 A. Yes.

4 Q. Do you own property in any other states?

09:08 5 A. No.

6 Q. Do you pay taxes in any other states?

7 A. No.

8 Q. Ms. Reynolds, have you ever been deposed
9 before today?

09:08 10 A. No.

11 Q. Have you ever served as a plaintiff in any
12 other lawsuits?

13 A. No.

14 Q. Have you ever served as a defendant in any
09:08 15 other lawsuits?

16 A. No.

17 Q. Have you ever participated in a class
18 action settlement before?

19 A. No.

09:08 20 Q. You have never participated in a class
21 action in any way?

22 A. No.

23 Q. Okay. I'm sure your counsel has been over
24 this with you, but I'd just like to remind you that
09:08 25 you are under oath so you have an obligation to

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lauren russell@tatp.com

Interim Lead Counsel for the New Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. CV-07-5944 SC

MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**NEW INDIRECT PURCHASER
PLAINTIFFS' OBJECTIONS AND
RESPONSES TO DEFENDANT SAMSUNG
SDI CO., LTD.'S FIRST SET OF
INTERROGATORIES**

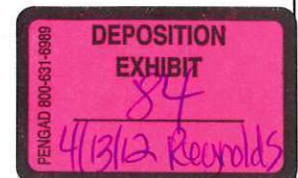
PROPOUNDING PARTY: SAMSUNG SDI CO., LTD.

RESPONDING PARTY: INDIRECT PURCHASER PLAINTIFFS:
Bedrock Management Company, Inc.; Kerry Lee Hall;
Lisa Reynolds; Barry Kushner; Conrad Carty; Janet
Ackerman; Steven Hawley.

SET NUMBER: ONE (1-16)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Bedrock Management Company, Inc., Kerry Lee Hall, Lisa Reynolds, Barry Kushner, Conrad Carty, Janet Ackerman and Steven Hawley ("New Indirect Purchaser Plaintiffs") hereby object and

NEW INDIRECT PURCHASER PLAINTIFFS' OBJECTIONS AND RESPONSES TO DEFENDANT SAMSUNG SDI CO., LTD.'S FIRST SET OF INTERROGATORIES CASE NO. CV-07-5944 SC



1 respond to the First Set of Interrogatories propounded by Defendant Samsung SDI Co., Ltd.
2 (“Defendant”), as set forth below.

3 **PRELIMINARY STATEMENT**

4 Each of the following responses is subject to all objections of and concerning relevance,
5 materiality, and admissibility, as well as to all and any other objections on any ground requiring
6 exclusion of any response if introduced in Court. All evidentiary objections and grounds
7 accordingly are expressly reserved. Furthermore, New Indirect Purchaser Plaintiffs’ decision,
8 now or in the future, to provide information notwithstanding the objectionable nature of the
9 Interrogatories shall not be construed as: (a) an admission that they agree with any of
10 Defendant’s definitions or characterizations contained therein, or (b) an admission that the
11 information sought likely will lead to the discovery of admissible evidence, or (c) an agreement
12 that requests for similar information will be treated in a similar manner.

13 For purposes of these Interrogatories, New Indirect Purchaser Plaintiffs define the term
14 “CRT Products” as televisions and computer monitors containing CRTs.

15 New Indirect Purchaser Plaintiffs’ objections and responses to the within First Set of
16 Interrogatories are made without prejudice to their right to introduce any or all evidence of any
17 kind in this case.

18 The specific objections and responses set forth below are based upon information now
19 known. New Indirect Purchaser Plaintiffs have not yet completed discovery or preparation for
20 trial in this case, and, therefore, reserve the right to amend, modify, or supplement any general or
21 specific objection or response.

22 Nothing in their objections and responses to these Interrogatories shall be construed as an
23 admission by New Indirect Purchaser Plaintiffs with respect to the competence, admissibility,
24 relevance, or materiality of any fact or document, or as an admission of the truth or accuracy of
25 any characterization of any information of any kind sought by these Interrogatories.

26 New Indirect Purchaser Plaintiffs reserve their right to object to use of their objections
27 and responses herein, or the subject matter thereof, on any ground in this or in any subsequent
28

1 proceeding, including, without limitation, the right to object on any ground at any time to the use
2 of such responses in any discovery procedures in this or any proceeding, and/or at trial.

3 The New Indirect Purchaser Plaintiffs' objections and responses to the Interrogatories are
4 subject to the provisions of the Stipulated Protective Order entered by the Court June 18, 2008
5 (Document 306) (the "Protective Order"). The New Indirect Purchaser Plaintiffs' Interrogatory
6 Objections and Responses hereby are designated "Confidential" in accordance with the
7 provisions of the Protective Order.

8 Each of the General Objections herein is considered applicable to and is hereby
9 incorporated into each and every response by Plaintiffs to the Interrogatories, and each response
10 is given without waiving any of the General Objections. The assertion of any General Objection
11 in response to any Interrogatory should not be considered a waiver of the remaining General
12 Objections. By making the responses herein, Plaintiffs do not concede that the information
13 provided is relevant to the claims or defenses of any party or reasonably calculated to lead to the
14 discovery of admissible evidence.

15 GENERAL OBJECTIONS

16 1. New Indirect Purchaser Plaintiffs object to, and will not answer, the
17 Interrogatories to the extent they seek discovery of information, legal analysis, and/or strategies
18 concerning any Class Certification motion New Indirect Purchaser Plaintiffs may file under Rule
19 23 of the Federal Rules of Civil Procedure. Such information, legal analysis, and/or strategies
20 are protected from disclosure by the attorney-client privilege and/or the work-product doctrine.

21 2. New Indirect Purchaser Plaintiffs object to, and will not answer, the
22 Interrogatories to the extent Defendant intends or purports to impose obligations beyond those
23 required or permitted by the Federal Rules of Civil Procedure and the Local Rules of the
24 Northern District of California, or to the extent they are outside the scope of any order or opinion
25 of this Court or of the Special Master, or contrary to any applicable rules of law.

26 3. New Indirect Purchaser Plaintiffs object to, and will not answer, the
27 Interrogatories to the extent they comprise premature "contention interrogatories," the answers to
28

1 which are dependent on merits and/or expert discovery. Pursuant to Rule 33(a)(2) of the Federal
2 Rules of Civil Procedure, New Indirect Purchaser Plaintiffs, as necessary or appropriate, will
3 respond to proper “contention interrogatories” after merits and expert discovery is complete,
4 and/or after some other time as directed by the Court or Special Master. *See, e.g., In re*
5 *Convergent Technologies Securities Litigation*, 108 F.R.D. 328, 336 (N.D. Cal. 1985) (“There is
6 considerable recent authority for the view that the wisest general policy is to defer propounding
7 and answering contention interrogatories until near the end of the discovery period.”); *In re eBay*
8 *Seller Antitrust Litigation*, No. C 07-1882 JF (RS), 2008 WL 5212170, at *1 (N.D. Cal. Dec. 11,
9 2008) (“Courts using their Rule 33(a)(2) discretion generally disfavor contention interrogatories
10 asked before discovery is undertaken.”).

11 4. New Indirect Purchaser Plaintiffs object to the Interrogatories, including the
12 Definitions and Instructions set forth therein, to the extent (a) they seek to elicit information
13 relating or referring to matters not raised by the pleadings, or (b) they seek to elicit information
14 that is not relevant to the claims or defenses of the parties to this action, or (c) they seek to elicit
15 information that is not within New Indirect Purchaser Plaintiffs’ possession, custody, or control,
16 or (d) they seek to elicit information not reasonably calculated to lead to the discovery of
17 admissible evidence.

18 5. New Indirect Purchaser Plaintiffs object to, and will not answer, the
19 Interrogatories to the extent they seek information protected by the attorney-client privilege,
20 work-product doctrine, or any other applicable privilege, protection, immunity, or rule
21 (collectively, “Privileged Information”), including, without limitation, information concerning
22 communications between New Indirect Purchaser Plaintiffs’ attorneys, and/or between New
23 Indirect Purchaser Plaintiffs and their attorneys, made during, or in anticipation of, litigation.
24 Any inadvertent disclosure of such information is not intended to, and shall not, constitute a
25 general or specific waiver, in whole or in part, of the foregoing privileges or immunities, or the
26 subject matter thereof. Relatedly, any inadvertent disclosure of such information is not intended
27 to, nor shall it, constitute a waiver of the right to object to any use of such information, and any
28

1 such disclosure shall be treated as specified in Rule 26(b)(5)(B) of the Federal Rules of Civil
2 Procedure.

3 6. New Indirect Purchaser Plaintiffs object to, and will not answer, the
4 Interrogatories to the extent that (a) they seek the premature disclosure of expert material subject
5 to Rule 26(a)(2)(C) of the Federal Rules of Civil Procedure, and/or (b) they seek disclosure of
6 information concerning any person or entity whom New Indirect Purchaser Plaintiffs will not
7 designate as an opinion or other witness at trial.

8 7. New Indirect Purchaser Plaintiffs object to the Interrogatories, including the
9 Definitions and Instructions set forth therein, to the extent they seek information that is equally
10 accessible to Defendant as it is to New Indirect Purchaser Plaintiffs, or that has been provided by
11 other parties or witnesses.

12 8. New Indirect Purchaser Plaintiffs object to the Interrogatories, including the
13 Definitions and Instructions set forth therein, to the extent they are cumulative to or duplicative
14 of other Interrogatories.

15 9. New Indirect Purchaser Plaintiffs object to, and will not answer, the
16 Interrogatories to the extent that they seek confidential or proprietary business information and
17 research.

18 10. New Indirect Purchaser Plaintiffs object to the purported definition of the terms
19 "YOU" and "YOUR" because they are vague, ambiguous, overly broad, and unduly
20 burdensome, as they seek information that is neither relevant nor reasonably calculated to lead to
21 the discovery of admissible information. Responding further, New Indirect Purchaser Plaintiffs
22 object to the inclusion of "agents, attorneys, representatives, or other persons acting or
23 purporting to act on behalf of the responding Plaintiff," within this Definition to the extent it
24 purports to encompass information that is protected by attorney-client privilege and/or work-
25 product doctrine, or any other applicable privilege, protection, immunity, or rule.

26 11. New Indirect Purchaser Plaintiffs object to the purported definition of the term
27 "DOCUMENT" to the extent it attempts to impose burdens on them greater than or inconsistent
28

1 with those imposed by the Federal Rules of Civil Procedure or the Local Rules for the United
2 States District Court for the Northern District of California.

3 12. New Indirect Purchaser Plaintiffs object to the purported definition of the term
4 "COMPLAINT" as overly broad to the extent it is construed to refer to any Complaint other than
5 Indirect Purchaser Plaintiffs' Third Consolidated Amended Complaint filed December 11, 2010
6 in the United States District Court for the Northern District of California.

7 13. New Indirect Purchaser Plaintiffs object to the Interrogatories, including the
8 Definitions and Instructions set forth therein, to the extent any one or more or all of them assume
9 disputed facts or legal conclusions. Any response or objection herein is without prejudice to this
10 objection and New Indirect Purchaser Plaintiffs' right to dispute such purported facts or legal
11 conclusions.

12 **SPECIFIC OBJECTIONS AND RESPONSES**

13 **INTERROGATORY NO. 1:**

14 IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR
15 responses to these interrogatories.

16 **RESPONSE NO. 1:**

17 In addition to their General Objections listed above, New Indirect Purchaser Plaintiffs
18 object to Interrogatory No. 1 because it calls for the disclosure of privileged information,
19 including without limitation, information subject to the attorney-client privilege and/or the work
20 product doctrine. New Indirect Purchaser Plaintiffs also object to Interrogatory No. 1 because it
21 seeks information that is neither relevant nor reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without waving the objections stated above, New Indirect Purchaser
24 Plaintiffs respond by referring to Samsung Exhibit A-26 through A-32.

25 **INTERROGATORY NO. 2:**

26 Separately identify each acquisition of a CRT upon which YOU base any claim in this
27 action, including without limitation the date and place of acquisition, the type and manufacturer
28

1 of each CRT acquired, and the IDENTITY of each PERSON involved in the acquisition and the
2 time period and nature of each PERSON'S involvement.

3 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
4 YOUR response.

5 **RESPONSE NO. 2:**

6 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
7 object to Interrogatory No. 2 because the term "acquisition" is vague, ambiguous, and overly
8 broad.

9 Subject to and without waiving the objections stated above, New Indirect Purchaser
10 Plaintiffs respond by stating that they are end users of CRT Products and did not acquire any
11 stand-alone CRTs during the relevant period.

12 **INTERROGATORY NO. 3:**

13 Separately identify each acquisition of a CRT PRODUCT upon which YOU base any
14 claim in this action, including without limitation the date and place of acquisition, the type and
15 manufacturer of each CRT PRODUCT acquired, and the IDENTITY of each PERSON involved
16 in the acquisition and the time period and nature of each PERSON'S involvement.

17 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
18 YOUR response.

19 **RESPONSE NO. 3:**

20 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
21 object to Interrogatory No. 3 because the term "acquisition" is vague, ambiguous, and overly
22 broad.

23 Subject to and without waiving the objections stated above, New Indirect Purchaser
24 Plaintiffs respond by stating that they purchased CRT Products containing CRTs. Responding
25 further, New Indirect Purchaser Plaintiffs refer to Samsung Exhibit B-26 through B-32.

1 **INTERROGATORY NO. 4:**

2 For each acquisition of a CRT identified in Interrogatory No. 2, state all terms and
3 conditions that were a part of the acquisition, including without limitation all terms and
4 conditions RELATING TO pricing, taxes, tariffs, duties, freight charges, or any other fees paid
5 by any PERSON in connection with the acquisition.

6 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
7 YOUR response.

8 **RESPONSE NO. 4:**

9 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
10 object to Interrogatory No. 4 because the term “acquisition” is vague, ambiguous, and overly
11 broad.

12 Subject to and without waiving the objections stated above, New Indirect Purchaser
13 Plaintiffs respond by stating that they are end users of CRT Products and did not acquire any
14 stand-alone CRTs during the relevant period.

15 **INTERROGATORY NO. 5:**

16 For each acquisition of a CRT PRODUCT identified in Interrogatory No. 3, state all
17 terms and conditions that were a part of the acquisition, including without limitation all terms
18 and conditions RELATING TO pricing, taxes, tariffs, duties, freight charges, or any other fees
19 paid by any PERSON in connection with the acquisition.

20 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
21 YOUR response.

22 **RESPONSE NO. 5:**

23 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
24 object to Interrogatory No. 5 because the term “acquisition” is vague, ambiguous, and overly
25 broad.

26 Subject to and without waiving the objections stated above, New Indirect Purchaser
27 Plaintiffs respond by referring to Samsung Exhibit B-26 through B-32.

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1 **INTERROGATORY NO. 6:**

2 For each acquisition of a CRT identified in Interrogatory No. 2, state whether the CRT
3 was acquired as part of a system or other bundled product (e.g., a CRT computer monitor
4 acquired in conjunction with a computer, keyboard, speakers, warranty, service plan, or other
5 services) and, if so, the value of each component of such system or bundled product.

6 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
7 YOUR response.

8 **RESPONSE NO. 6:**

9 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
10 object to Interrogatory No. 6 because (a) the term “acquisition” and the phrase “acquired as part
11 of a system or other bundled product (e.g., a CRT computer monitor acquired in conjunction
12 with a computer, keyboard, speakers, warranty, service plan, or other services)” are vague,
13 ambiguous, overly broad, and unduly burdensome, and (b) it seeks information that is neither
14 relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding
15 further, to the extent Defendant seeks discovery related to “the value of each component of such
16 system or bundled product,” New Indirect Purchaser Plaintiffs also object to Interrogatory No. 6
17 because it (a) prematurely seeks to elicit prior to merits discovery legal theories, analysis, and
18 other matters on which opinion testimony may be required at trial, (b) purports to require a
19 layperson to provide answers on matters as to which opinion testimony may be required at trial,
20 and (c) calls for legal conclusions and compels the assumption of facts not yet in evidence, and
21 (d) prematurely seeks disclosure of expert material subject to Rule 26(a)(2)(C) of the Federal
22 Rules of Civil Procedure.

23 Subject to and without waiving the objections stated above, New Indirect Purchaser
24 Plaintiffs respond by stating that they are end users of CRT Products and did not acquire any
25 stand-alone CRTs during the relevant period.

INTERROGATORY NO. 7:

For each acquisition of a CRT PRODUCT identified in Interrogatory No. 3, state whether the CRT PRODUCT was acquired as part of a system or other bundled product (e.g., a CRT computer monitor acquired in conjunction with a computer, keyboard, speakers, warranty, service plan, or other services) and, if so, the value of each component of such system or bundled product.

As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports YOUR response.

RESPONSE NO. 7:

In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs object to Interrogatory No. 7 because (a) the term “acquisition” the phrase “acquired as part of a system or other bundled product (e.g., a CRT computer monitor acquired in conjunction with a computer, keyboard, speakers, warranty, service plan, or other services)” are vague, ambiguous, overly broad, and unduly burdensome, and (b) it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding further, to the extent Defendant seeks discovery related to “the value of each component of such system or bundled product,” New Indirect Purchaser Plaintiffs also object to Interrogatory No. 7 because it (a) prematurely seeks to elicit prior to merits discovery legal theories, analysis, and other matters on which opinion testimony may be required at trial, (b) purports to require a layperson to provide answers on matters as to which opinion testimony may be required at trial, and (c) calls for legal conclusions and compels the assumption of facts not yet in evidence, and (d) prematurely seeks disclosure of expert material subject to Rule 26(a)(2)(C) of the Federal Rules of Civil Procedure.

Subject to and without waiving the objections stated above, New Indirect Purchaser Plaintiffs respond by referring to Samsung Exhibit B-26 through B-32.

1 **INTERROGATORY NO. 8:**

2 For each acquisition of a CRT identified in Interrogatory No. 2, identify any warranties,
3 servicing plans or agreements, membership rewards, or other benefits received by YOU
4 RELATING TO the acquisition.

5 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
6 YOUR response.

7 **RESPONSE NO. 8:**

8 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
9 object to Interrogatory No. 8 because (a) the terms “servicing plans or agreements, membership
10 rewards, or other benefits” are vague, ambiguous, and overly broad, and (b) it seeks information
11 that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

12 Subject to and without waiving the objections stated above, New Indirect Purchaser
13 Plaintiffs respond by stating that they are end users of CRT Products and did not acquire any
14 stand-alone CRTs during the relevant period.

15 **INTERROGATORY NO. 9:**

16 For each acquisition of a CRT PRODUCT identified in Interrogatory No. 3, identify any
17 warranties, servicing plans or agreements, membership rewards, or other benefits received by
18 YOU RELATING TO the acquisition.

19 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
20 YOUR response.

21 **RESPONSE NO. 9:**

22 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
23 object to Interrogatory No. 9 because (a) the terms “servicing plans or agreements, membership
24 rewards, or other benefits” are vague, ambiguous, and overly broad, and (b) it seeks information
25 that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

26 Subject to and without waiving the objections stated above, New Indirect Purchaser
27 Plaintiffs respond by referring to Samsung Exhibit B-26 through B-32.

28

1 **INTERROGATORY NO. 10:**

2 Identify the purpose(s) for which YOU acquired each CRT during the RELEVANT
3 PERIOD, including without limitation whether the CRT was acquired for resale and, if so,
4 whether and under what terms and conditions it was resold.

5 **RESPONSE NO. 10:**

6 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
7 object to Interrogatory No. 10 because it seeks information that is neither relevant nor reasonably
8 calculated to lead to the discovery of admissible evidence.

9 Subject to and without waiving the objections stated above, New Indirect Purchaser
10 Plaintiffs respond by stating that they are end users of CRT Products and did not acquire any
11 stand-alone CRTs during the relevant period.

12 **INTERROGATORY NO. 11:**

13 Identify the purpose(s) for which YOU acquired each CRT PRODUCT during the
14 RELEVANT PERIOD, including without limitation whether the CRT PRODUCT was acquired
15 for resale and, if so, whether and under what terms and conditions it was resold.

16 **RESPONSE NO. 11:**

17 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
18 object to Interrogatory No. 11 because it seeks information that is neither relevant nor reasonably
19 calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiving the objections stated above, New Indirect Purchaser
21 Plaintiffs respond by stating that, as end users, they purchased CRT Products for their own use
22 and not for resale. New Indirect Purchaser Plaintiffs also respond by referring to Samsung
23 Exhibit B-26 through B-32.

24 **INTERROGATORY NO. 12:**

25 IDENTIFY all PERSONS with knowledge of the factors that influenced each of YOUR
26 decisions to acquire or not to acquire CRTs during the RELEVANT PERIOD.

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1 **RESPONSE NO. 12:**

2 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
3 object to Interrogatory No. 12 because (a) it seeks information that is neither relevant nor
4 reasonably calculated to lead to the discovery of admissible evidence, and (b) it is harassing and
5 invasive.

6 Subject to and without waiving the objections stated above, New Indirect Purchaser
7 Plaintiffs respond by stating that they are end users of CRT Products and did not consider
8 acquiring any stand-alone CRTs during the relevant period.

9 **INTERROGATORY NO. 13:**

10 IDENTIFY all PERSONS with knowledge of the factors that influenced each of YOUR
11 decisions to acquire or not to acquire CRT PRODUCTS during the RELEVANT PERIOD.

12 **RESPONSE NO. 13:**

13 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
14 object to Interrogatory No. 13 because (a) it seeks information that is neither relevant nor
15 reasonably calculated to lead to the discovery of admissible evidence, and (b) it is harassing and
16 invasive.

17 Subject to and without waiving the objections stated above, New Indirect Purchaser
18 Plaintiffs respond by referring to Samsung Exhibit B-26 through B-32.

19 **INTERROGATORY NO. 14:**

20 IDENTIFY all trade publications, advertisements, or news articles RELATING TO the
21 price or product features of CRTs that YOU reviewed during the RELEVANT PERIOD.

22 **RESPONSE NO. 14:**

23 In addition to their General Objections listed above, New Indirect Purchaser Plaintiffs
24 object to Interrogatory No. 14 because (a) the terms "all trade publications, advertisements, or
25 news articles" are vague, ambiguous, and overly broad, and (b) it seeks information that is
26 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving the objections stated above, New Indirect Purchaser
2 Plaintiffs respond by referring to Samsung Exhibit D-26 through D-32.

3 **INTERROGATORY NO. 15:**

4 IDENTIFY all trade publications, advertisements, or news articles RELATING TO the
5 price or product features of CRT PRODUCTS that YOU reviewed during the RELEVANT
6 PERIOD.

7 **RESPONSE NO. 15:**

8 In addition to their General Objections listed above, New Indirect Purchaser Plaintiffs
9 object to Interrogatory No. 15 because (a) the terms “all trade publications, advertisements, or
10 news articles” are vague, ambiguous, and overly broad, and (b) it seeks information that is
11 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

12 Subject to and without waiving the objections stated above, New Indirect Purchaser
13 Plaintiffs respond by referring to Samsung Exhibit D-26 through D-32.

14 **INTERROGATORY NO. 16:**

15 State whether, at any time during the RELEVANT PERIOD, YOU elected to acquire a
16 non-CRT television or computer monitor instead of a CRT PRODUCT and, if so, identify
17 YOUR reasons for making each such acquisition.

18 **RESPONSE NO. 16:**

19 In addition to the General Objections listed above, New Indirect Purchaser Plaintiffs
20 object to Interrogatory No. 16 because (a) the terms “elected to acquire” are vague, ambiguous,
21 and overly broad and (b) it seeks information that is neither relevant nor reasonably calculated to
22 lead to the discovery of admissible evidence.

23 Subject to and without waiving the objections stated above, New Indirect Purchaser
24 Plaintiffs respond by referring to Samsung Exhibit E-26 through E-32.

25
26 Dated: August 31, 2011

By: /s/ Mario N. Alioto
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Produced on 9/7/11

SAMSUNG EXHIBIT A26

PLAINTIFF BEDROCK MANAGEMENT COMPANY, INC.

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Produced on 9/7/11

SAMSUNG EXHIBIT A27

PLAINTIFF KERRY LEE HALL

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Produced on 9/7/11

SAMSUNG EXHIBIT A28

PLAINTIFF LISA REYNOLDS

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Produced on 9/7/11

SAMSUNG EXHIBIT A29

PLAINTIFF BARRY KUSHNER

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Produced on 9/7/11

SAMSUNG EXHIBIT A30

PLAINTIFF CONRAD CARTY

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Produced on 9/7/11

SAMSUNG EXHIBIT A31

PLAINTIFF JANET ACKERMAN

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Produced on 9/7/11

SAMSUNG EXHIBIT A32

PLAINTIFF STEVEN HAWLEY

Steven Hawley

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Produced on 9/7/11

SAMSUNG EXHIBIT B26

PLAINTIFF BEDROCK MANAGEMENT

1. **CRT PRODUCT:** Dell 17-inch E773c Monitor
2. **DATE OF PURCHASE:** 9/3/03
3. **LOCATION of PURCHASE:** Dell
4. **PERSONS INVOLVED IN PURCHASE:** Curtis Large
5. **PRICE:** \$801.00 (including computer and other items)
6. **TAXES/FEEs:** \$46.06 (on price of entire computer and other items)
7. **BUNDLE:** The computer monitor was purchased as part of a system.
8. **WARRANTIES:** The computer bundle had a 2 year limited warranty. There was a \$100 rebate on the system, but it is unclear whether or not the business took advantage of this rebate.
9. **PURPOSE of PURCHASE:** Use within business and not for resale.

See also CRT000373-374.

Produced on 9/7/11

SAMSUNG EXHIBIT B27

PLAINTIFF KERRY LEE HALL

1. **CRT PRODUCT:** Sears Home Central Series LXI 13" Color Television
2. **DATE OF PURCHASE:** 3/25/2001
3. **LOCATION of PURCHASE:** Sears - Scarborough, Maine
4. **PERSONS INVOLVED IN PURCHASE:** Kerry Lee Hall (plaintiff)
5. **PRICE:** \$79.88
6. **TAXES/FEES:** \$3.99
7. **BUNDLE:** Not purchased as part of a bundle or system.
8. **WARRANTIES:** Full 90 day warranty from date of purchase; free repairs for defective workmanship and free replacement for defective parts within one year of purchase.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000508-512.

Produced on 9/7/11

SAMSUNG EXHIBIT B28

PLAINTIFF LISA REYNOLDS

1. **CRT PRODUCT:** 3 JVC Color Televisions
2. **DATE OF PURCHASE:** While each was purchased during the class period, the specific purchase date is unknown for two of the televisions. One was purchased on 11/17/00.
3. **LOCATION of PURCHASE:** All were purchased at ABC Warehouse, 3830 28th Street SE, Kentwood, MI 49512
4. **PERSONS INVOLVED IN PURCHASES:** Lisa Reynolds (plaintiff)
5. **PRICE:** Not available for two; \$356.03 (including tax) for one
6. **TAXES/FEES:** The standard sales tax was applied to the purchases of the televisions.
7. **BUNDLE:** None of the televisions were purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000518-524.

Produced on 9/7/11

SAMSUNG EXHIBIT B29

PLAINTIFF BARRY KUSHNER

1. **CRT PRODUCT:**
 - a. Philips – Magnavox Television
 - b. Toshiba Television
2. **DATE OF PURCHASE:**
 - a. 3/22/00
 - b. 1995
3. **LOCATION of PURCHASE:**
 - a. Best Buy – Inver Grove Heights, Minnesota
 - b. Plaintiff purchased from a retailer whose name he does not recall; retailer is out of business
4. **PERSONS INVOLVED IN PURCHASES:** Barry Kushner (plaintiff)
5. **PRICE:**
 - a. \$297.97
 - b. Not available.
6. **TAXES/FEES:**
 - a. \$18.20
 - b. The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** Neither television was purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000381-418.

Produced on 9/7/11

SAMSUNG EXHIBIT B30

PLAINTIFF CONRAD CARTY

1. CRT PRODUCT:

- a. Samsung 42" television – S/N: HS4255WX/XAA
- b. Daewoo 19" television

2. DATE OF PURCHASE:

- a. 9/2006
- b. 12/2006

3. LOCATION of PURCHASE:

- a. Best Buy – Middletown, NY
- b. Shop Rite – Chester, NY

4. PERSONS INVOLVED IN PURCHASE: Conrad Carty (plaintiff)

5. PRICE:

- a. \$1,200
- b. \$179.00

6. TAXES/FEEs: The standard sales tax was applied to the purchases of the televisions.

7. BUNDLE: Neither television was purchased as part of a bundle or system.

8. WARRANTIES: None other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000375-380.

Produced on 9/7/11

SAMSUNG EXHIBIT B31

PLAINTIFF JANET ACKERMAN

1. **CRT PRODUCT:** Toshiba Television 26HF85
2. **DATE OF PURCHASE:** 10/17/2005
3. **LOCATION of PURCHASE:** P.C. Richard & Son - Ralph Avenue Store #35 - Brooklyn, N.Y.
4. **PERSONS INVOLVED IN PURCHASE:** Janet Ackerman (plaintiff)
5. **PRICE:** \$426.97
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000506-507.

Produced on 9/7/11

SAMSUNG EXHIBIT B32

PLAINTIFF STEVEN HAWLEY

1. CRT PRODUCT:

- a. GE Television – S/N: 634273799
- b. GE Television – Model Number 19GT243
- c. Dell Computer Monitor – Model Number M781s
- d. Samsung Television – S/N: 39153CDY500057P
- e. Samsung Television – S/N: B18L3CCL300900R

2. DATE OF PURCHASE:

- a. 1997
- b. 2002
- c. 2002
- d. 2005
- e. 2006

3. LOCATION of PURCHASE:

- a. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- b. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- c. Dell
- d. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- e. Circuit City, 9565 South Boulevard, Charlotte, NC 28273

4. PERSONS INVOLVED IN PURCHASE: Steven Hawley (plaintiff)

5. PRICE: Not available.

6. TAXES/FEES: The standard sales tax was applied to all purchases.

7. BUNDLE:

- a. Not purchased as part of a bundle or system.
- b. Not purchased as part of a bundle or system.
- c. Was purchased as part of a bundle or system.
- d. Not purchased as part of a bundle or system.
- e. Not purchased as part of a bundle or system.

8. WARRANTIES: None other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000513-517.

Produced on 9/7/11

SAMSUNG EXHIBIT D26

PLAINTIFF BEDROCK MANAGEMENT

CRTs: Response pending.

CRT Products: Response pending.

Produced on 9/7/11

SAMSUNG EXHIBIT D27

PLAINTIFF KERRY LEE HALL

CRTs: Ms. Hall does not believe she reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Ms. Hall does not recall reviewing any trade publications, advertisements, or news articles relating to the price or product features of CRT products during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT D28

PLAINTIFF LISA REYNOLDS

CRTs: Ms. Reynolds does not believe she reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Ms. Reynolds reviewed advertisements related to CRT products during the relevant time period, but she does not recall anything specific.

Produced on 9/7/11

SAMSUNG EXHIBIT D29

PLAINTIFF BARRY KUSHNER

CRTs: Mr. Kushner does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Kushner does not recall reviewing any trade publications, advertisements, or news articles relating to the price or product features of CRT products during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT D30

PLAINTIFF CONRAD CARTY

CRTs: Mr. Carty does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Carty does not recall reviewing any trade publications, advertisements, or news articles relating to the price or product features of CRT products during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT D31

PLAINTIFF JANET ACKERMAN

CRTs: Ms. Ackerman does not believe she reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Ms. Ackerman did see advertisements related to CRT products during the relevant time period in passing in publications such as The New York Times, the New York Post, and/or the New York Daily News, but she has no specific recollection of any of these advertisements.

Produced on 9/7/11

SAMSUNG EXHIBIT D32

PLAINTIFF STEVE HAWLEY

CRTs: Mr. Hawley does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Hawley does not recall reviewing any trade publications, advertisements, or news articles relating to the price or product features of CRT products during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT E26

PLAINTIFF BEDROCK MANAGEMENT

Response pending.

Produced on 9/7/11

SAMSUNG EXHIBIT E27

PLAINTIFF KERRY LEE HALL

Ms. Hall acquired an Acer 20" LCD computer monitor and a Samsung 42" LCD television during the relevant time period because she believed the LCDs looked better than the CRTs and the price point worked for her.

Produced on 9/7/11

SAMSUNG EXHIBIT E28

PLAINTIFF LISA REYNOLDS

Ms. Reynolds did not purchase a non-CRT television or computer monitor during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT E29

PLAINTIFF BARRY KUSHNER

Mr. Kushner purchased a small LCD television in March 2007 for his kitchen counter. He purchased it because it was on sale and, at the time, he thought the technology was better than plasma technology.

Produced on 9/7/11

SAMSUNG EXHIBIT E30

PLAINTIFF CONRAD CARTY

Response pending.

Produced on 9/7/11

SAMSUNG EXHIBIT E31

PLAINTIFF JANET ACKERMAN

Ms. Ackerman purchased an LCD television in either 2005 or 2006 because she wanted to buy a DVD player and the LCD television she purchased had one built-in. Ms. Ackerman also purchased the LCD television, in part, on the recommendation of store personnel.

Produced on 9/7/11

SAMSUNG EXHIBIT E32

PLAINTIFF STEVE HAWLEY

Mr. Hawley did not purchase a non-CRT television or computer monitor during the relevant time period.

EXHIBIT 23

DEL NO. CX32E60
CHASSIS NO. TAC 9530
MANUFACTURED: JANUARY 1996 G

PLACE OF MANUFACTURE PLACE DE MANUFACTURE
TOSHIBA AMERICA CONSUMER PRODUCTS, INC. LEBANON, TN 37087 U.S.A.

DISTRIBUTED

TOSHIBA AMERICA CONSUMER PRODUCTS, INC.
82 TOTOWA ROAD, WAYNE, NEW JERSEY 07470 U.S.A.
TOSHIBA OF CANADA LTD.
MARKHAM, ONTARIO L3R 8H2, CANADA

SERIAL NO. 70567790

DEPOSITION
EXHIBIT
14
3/21/2 Kushner

EXHIBIT 24

TV

Page 12

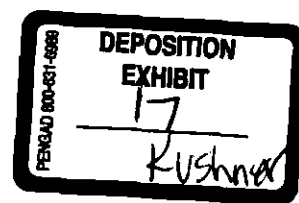
SPECIAL INSTRUCTIONS _____

MANAGER _____

I HAVE READ AND REFERRED TO MY ACCOUNT AND
 BELIEVE FIGURES SHOWN ON THE FORM OF THIS
 RECEIPT CORRECTLY POSTED IN THE STORE. I HAVE
 RECEIVED GOODS AND/OR SERVICES IN THE
 AMOUNT SHOWN ABOVE.

Larry Kushner

CUSTOMER



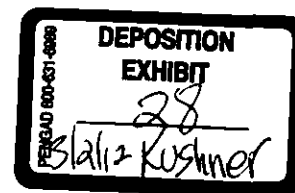
Produced on 9/7/11

SAMSUNG EXHIBIT B26

PLAINTIFF BEDROCK MANAGEMENT

1. **CRT PRODUCT:** Dell 17-inch E773c Monitor
2. **DATE OF PURCHASE:** 9/3/03
3. **LOCATION of PURCHASE:** Dell
4. **PERSONS INVOLVED IN PURCHASE:** Curtis Large
5. **PRICE:** \$801.00 (including computer and other items)
6. **TAXES/FEES:** \$46.06 (on price of entire computer and other items)
7. **BUNDLE:** The computer monitor was purchased as part of a system.
8. **WARRANTIES:** The computer bundle had a 2 year limited warranty. There was a \$100 rebate on the system, but it is unclear whether or not the business took advantage of this rebate.
9. **PURPOSE of PURCHASE:** Use within business and not for resale.

See also CRT000373-374.



Produced on 9/7/11

SAMSUNG EXHIBIT B28

PLAINTIFF LISA REYNOLDS

1. **CRT PRODUCT:** 3 JVC Color Televisions
2. **DATE OF PURCHASE:** While each was purchased during the class period, the specific purchase date is unknown for two of the televisions. One was purchased on 11/17/00.
3. **LOCATION of PURCHASE:** All were purchased at ABC Warehouse, 3830 28th Street SE, Kentwood, MI 49512
4. **PERSONS INVOLVED IN PURCHASES:** Lisa Reynolds (plaintiff)
5. **PRICE:** Not available for two; \$356.03 (including tax) for one
6. **TAXES/FEES:** The standard sales tax was applied to the purchases of the televisions.
7. **BUNDLE:** None of the televisions were purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000518-524.

Produced on 9/7/11

SAMSUNG EXHIBIT B29

PLAINTIFF BARRY KUSHNER

1. CRT PRODUCT:

- a. Philips – Magnavox Television
- b. Toshiba Television

2. DATE OF PURCHASE:

- a. 3/22/00
- b. 1995

3. LOCATION of PURCHASE:

- a. Best Buy – Inver Grove Heights, Minnesota
- b. Plaintiff purchased from a retailer whose name he does not recall; retailer is out of business

4. PERSONS INVOLVED IN PURCHASES: Barry Kushner (plaintiff)

5. PRICE:

- a. \$297.97
- b. Not available.

6. TAXES/FEES:

- a. \$18.20
- b. The standard sales tax was applied to the purchase of the television.

7. BUNDLE: Neither television was purchased as part of a bundle or system.

8. WARRANTIES: None other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000381-418.

Produced on 9/7/11

SAMSUNG EXHIBIT B30

PLAINTIFF CONRAD CARTY

1. CRT PRODUCT:

- a. Samsung 42" television – S/N: HS4255WX/XAA
- b. Daewoo 19" television

2. DATE OF PURCHASE:

- a. 9/2006
- b. 12/2006

3. LOCATION of PURCHASE:

- a. Best Buy – Middletown, NY
- b. Shop Rite – Chester, NY

4. PERSONS INVOLVED IN PURCHASE: Conrad Carty (plaintiff)

5. PRICE:

- a. \$1,200
- b. \$179.00

6. TAXES/FEES: The standard sales tax was applied to the purchases of the televisions.

7. BUNDLE: Neither television was purchased as part of a bundle or system.

8. WARRANTIES: None other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000375-380.

Produced on 9/7/11

SAMSUNG EXHIBIT B31

PLAINTIFF JANET ACKERMAN

1. **CRT PRODUCT:** Toshiba Television 26HF85
2. **DATE OF PURCHASE:** 10/17/2005
3. **LOCATION of PURCHASE:** P.C. Richard & Son - Ralph Avenue Store #35 - Brooklyn, N.Y.
4. **PERSONS INVOLVED IN PURCHASE:** Janet Ackerman (plaintiff)
5. **PRICE:** \$426.97
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000506-507.

Produced on 9/7/11

SAMSUNG EXHIBIT B32

PLAINTIFF STEVEN HAWLEY

1. CRT PRODUCT:

- a. GE Television – S/N: 634273799
- b. GE Television – Model Number 19GT243
- c. Dell Computer Monitor – Model Number M781s
- d. Samsung Television – S/N: 39153CDY500057P
- e. Samsung Television – S/N: B18L3CCL300900R

2. DATE OF PURCHASE:

- a. 1997
- b. 2002
- c. 2002
- d. 2005
- e. 2006

3. LOCATION of PURCHASE:

- a. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- b. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- c. Dell
- d. Circuit City, 9565 South Boulevard, Charlotte, NC 28273
- e. Circuit City, 9565 South Boulevard, Charlotte, NC 28273

4. PERSONS INVOLVED IN PURCHASE: Steven Hawley (plaintiff)

5. PRICE: Not available.

6. TAXES/FEES: The standard sales tax was applied to all purchases.

7. BUNDLE:

- a. Not purchased as part of a bundle or system.
- b. Not purchased as part of a bundle or system.
- c. Was purchased as part of a bundle or system.
- d. Not purchased as part of a bundle or system.
- e. Not purchased as part of a bundle or system.

8. WARRANTIES: None other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000513-517.

EXHIBIT 25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

---o0o---

In Re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION,)
Plaintiff,)

Case No.
07-5944 Sc
MDL No. 1917

This Document Relates to:)
ALL ACTIONS,)

VIDEOTAPED DEPOSITION OF BARRY KUSHNER
FRIDAY, MARCH 2, 2012

REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 please respond verbally to my questions and avoid
2 answering with nonverbal responses, such as by
3 nodding your head. The purpose of this is so that
4 the written transcript will be clear.

09:00 5 Do you understand?

6 A. Yes.

7 Q. Please let me finish my question and give
8 your attorney an opportunity to object before
9 responding so that we are not talking over each
09:00 10 other. Again, this helps to ensure that the
11 transcript will be clear; understood?

12 A. Yes.

13 Q. Finally, so long as there's not a question
14 pending, if you would like to take a break, please
09:00 15 just let me know.

16 A. Okay.

17 Q. Mr. Kushner, what is your current home
18 address?

19 A. 638 Quail Ridge Circle, Mendota Heights,
09:00 20 Minnesota 55120.

21 Q. How long have you lived at that address?

22 A. Twenty-three years.

23 Q. That's your primary residence?

24 A. Yes.

09:01 25 Q. Do you have any homes outside Minnesota?

1 A. No.

2 Q. Have you ever lived in a state other than
3 Minnesota?

4 A. Yes.

09:01 5 Q. When was that?

6 A. 1941, 1968, 1983.

7 Q. Okay. Are you represented today by
8 counsel?

9 A. Yes.

09:01 10 Q. I would like to please mark as Exhibit 12
11 the notice of deposition for Mr. Kushner.

12 (Reporter marked [Exhibit No. 12](#) for
13 identification.)

14 Q. BY MS. DONOVAN: Mr. Kushner, do you
09:01 15 recognize this document?

16 A. Yes.

17 Q. Would you please identify it for the
18 record?

19 A. It's a notice of deposition of Barry
09:02 20 Kushner.

21 Q. And when did you first see this document?

22 A. A few weeks ago.

23 Q. Without telling me what was said, did you
24 discuss it with your attorney?

09:02 25 A. Yes.

1 containing a CRT unless I say otherwise;
2 understood?

3 A. Understood.

4 Q. I am going to ask you a series of
09:05 5 questions about the Toshiba television that you
6 purchased. When did you purchase the Toshiba
7 television?

8 A. Originally I thought in '95, but it was
9 '96, 1996.

09:05 10 Q. Okay. And what's your reason to believe
11 that you purchased the Toshiba television in 1996?

12 A. I took a picture of the back of the TV,
13 and it listed the cathode ray tube being
14 manufactured in '96. So I couldn't have purchased
09:05 15 it in '95, but that was my recollection.

16 Q. Does the label on the back of the TV state
17 that the cathode ray tube was manufactured in 1996
18 or that the television was manufactured in 1996?

19 A. I believe the cathode ray tube.

09:06 20 Q. Other than the label on the back of the
21 television, do you have any independent
22 recollection of purchasing the television in 1996?

23 A. No, I do not.

24 Q. Is there any document that you could look
09:06 25 at to refresh your recollection about when you

1 MR. GRALEWSKI: If you can. Whenever I
2 make an objection, unless I instruct you not to
3 answer, you can answer if you understand.

4 THE WITNESS: Yeah.

09:14 5 Would you repeat the question, Molly?

6 Q. BY MS. DONOVAN: Sure, and I will try to
7 clarify. Did you consider purchasing other
8 televisions containing technologies other than a
9 CRT?

09:14 10 MR. GRALEWSKI: Same objection.

11 THE WITNESS: At that time?

12 Q. BY MS. DONOVAN: Yes.

13 A. No.

14 Q. Why not?

09:15 15 MR. GRALEWSKI: Same objections.

16 THE WITNESS: I don't believe there was
17 any other technology available at the time.

18 Q. BY MS. DONOVAN: Where did you purchase
19 the Toshiba television?

09:15 20 A. Here in the Twin Cities.

21 Q. Did you buy the television from a big-box
22 retailer like a Walmart or a Costco?

23 A. No.

24 Q. Do you know where you did purchase the
09:15 25 television?

1 Q. Do you know approximately when this store
2 went out of business?

3 A. No idea.

4 Q. Are there any documents that would refresh
09:17 5 your recollection about the name of the store that
6 you purchased the Toshiba television from?

7 A. No.

8 Q. Is there anyone you could ask who might
9 remember the name of the store?

09:17 10 A. No.

11 Q. Did you buy the television new?

12 A. Yes.

13 Q. Was the store physically located within
14 Minnesota?

09:17 15 A. To the best of my knowledge.

16 Q. Did you ever write down the number of the
17 store?

18 A. Clarify.

19 Q. Did you ever write down the --

09:17 20 A. Telephone number?

21 Q. Correct.

22 A. Probably at that time, but I don't have
23 any of that information anymore.

24 Q. Was the store a retailer?

09:18 25 MR. GRALEWSKI: Object to the form of the

1 corner there's the number TS2746C101. To your
2 knowledge, is that the model number of the
3 television?

4 A. I would say so, yes, to my knowledge.

10:03 5 Q. And does this label indicate whether or
6 not the television contains a CRT?

7 A. Does not. I can't tell.

8 Q. That's all. I am going to mark as Exhibit
9 17 a one-page document with Bates No. CRT000416.

10:03 10 (Reporter marked Exhibit No. 17 for
11 identification.)

12 Q. BY MS. DONOVAN: Mr. Kushner, do you
13 recognize this document?

14 A. Yes, I do.

10:04 15 Q. And what is it?

16 A. That's a receipt for the television I
17 bought at Best Buy.

18 Q. Is this two separate documents photocopied
19 onto one page, or is the original one single
10:04 20 document?

21 A. One single document is my best guess.

22 Q. There's a number on the top of the page,
23 8656139. Do you know what that number represents?

24 A. I do not.

10:04 25 Q. And 638 Quail Ridge Circle, that was your

1 correct address in Minnesota at the time that you
2 purchased this television?

3 A. Correct.

4 Q. And that remains your address today,
10:04 5 correct?

6 A. Correct.

7 Q. What's the date of this receipt?

8 A. I cannot read it, but it had to be in
9 2000.

10:05 10 Q. And look at the --

11 A. It looks like March 22, but I am not sure.

12 Q. March 22, 2000, right?

13 A. Yeah, I think so. That's what it looks
14 like.

10:05 15 Q. And it is difficult to read, but I believe
16 this indicates that you paid a delivery fee of
17 29.95. Does that sound correct?

18 A. That looks correct.

19 Q. And then there's some kind of charge
10:05 20 beneath the delivery fee, but I can't read what the
21 charge is for or the dollar amount. Can you?

22 A. No.

23 Q. But there is a handwritten notation to the
24 left of that reading "279.97"; is that your
10:05 25 handwriting?

EXHIBIT 26

Produced on 9/7/11

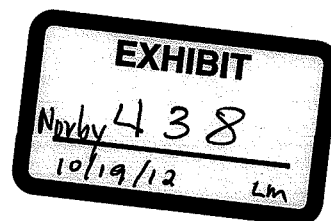
SAMSUNG EXHIBIT A13

PLAINTIFF DAVID NORBY

David Norby
869 South McKnight Road
St. Paul, MN 55119

Seymour Mansfield
MANSFIELD, TANICK & COHEN, P.A.
220 South Sixth Street
Minneapolis, MN 55402

Robert J. Gralewski, Jr.
KIRBY McINERNEY LLP
825 Third Avenue
New York, NY 10022



Produced on 9/7/11

SAMSUNG EXHIBIT B13

PLAINTIFF DAVID NORBY

1. **CRT PRODUCT:** Magnavox television – S/N: YA1A0634025035
2. **DATE OF PURCHASE:** 1/06
3. **LOCATION of PURCHASE:** Target
4. **PERSONS INVOLVED IN PURCHASE:** David Norby (plaintiff)
5. **PRICE:** Not available.
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000015-16 and CRT000071-72.

Produced on 9/7/11

SAMSUNG EXHIBIT D13

PLAINTIFF DAVID NORBY

CRTs: Mr. Norby does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Norby does not recall reviewing any trade publications, advertisements, or news articles relating to the price or product features of CRT products during the relevant time period.

Produced on 9/7/11

SAMSUNG EXHIBIT E13

PLAINTIFF DAVID NORBY

Mr. Norby did not purchase a non-CRT television or computer monitor during the relevant time period.

EXHIBIT 27

LG PHILIPS Displays
 9301-891-90631
A68AJB82X11
 SER. NO.: 060210 53198
 E228125 215656
 EIA 312
 MADE IN MEXICO

WARNING THIS CATHODE RAY TUBE EMPLOYS AN INTERNAL PROTECTION. REPLACE WITH A CATHODE RAY TUBE OF THE SAME TYPE NUMBER FOR CONTINUED SAFETY.
AVERTISSEMENT CE TUBE CATHODE EMPLOIE UNE PROTECTION INTERIEURE. REMPLACEZ LE TUBE PAR UN TUBE DE MEME TYPE POUR NE PAS COMPROMETTRE LA SECURITE.

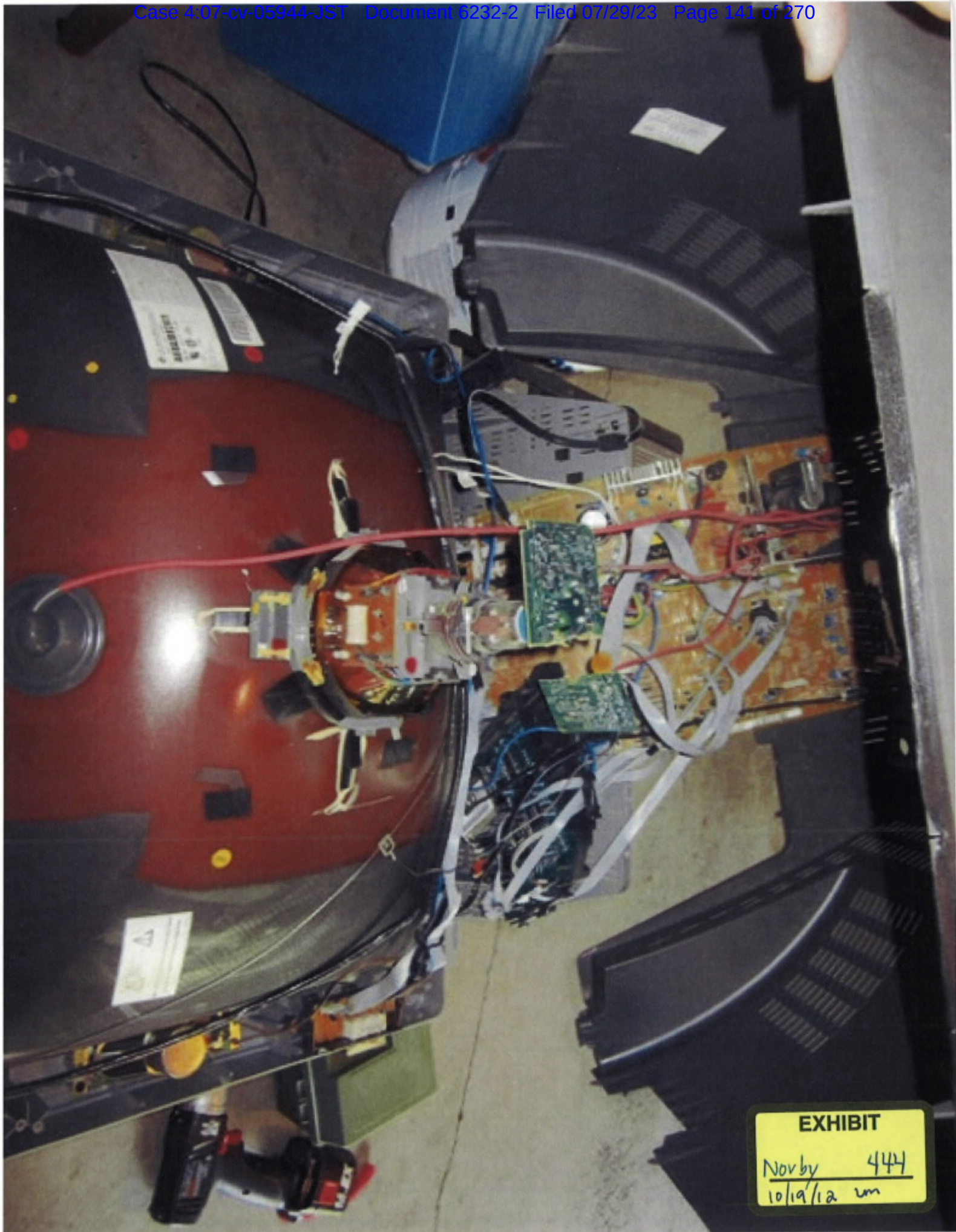
CAUTION High vacuum picture tube. Handle with care. Do not strike, scratch or stress. Inside and outside is accordance with manufacturer's published recommendations. Before handling ensure the tube is completely discharged. The tube may still be under vacuum and disposed of by trained personnel.

X-RADIATION NOTICE Do not operate this tube above maximum ratings. Refer to appendix for X-ray emission information. Cathode ray tube assembly with according to appendix B. Röntgenstrahlung: Eigenschaften Kathodenstrahlröhren sind angegeben im Anhang B.

Barcode: LP190631M0604224884
 PJX11 - 1537



EXHIBIT
 Novby 443
 10/19/12 um



EXHIBIT

Norby 444
10/19/12 um

EXHIBIT 28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY Master File No.
TUBE (CRT) ANTITRUST CV-07-5944 SC
LITIGATION, MDL NO. 1917

 Judge: Hon. Samuel Conti
 Special Master:
 Hon. Charles Legge (Ret.)

This Document Relates to:
ALL INDIRECT PURCHASER ACTIONS

DEPOSITION OF
DAVID G. NORBY

Taken October 19, 2012

Scheduled for 9:00 a.m.

Reported By: Lori Morrow, RPR, CRR, CLR

1 before I start asking my next question. That way the
2 reporter will have a better time capturing all the words.

3 A Sounds good.

4 Q We can take a break whenever you want. Just
5 let me know. The only thing that I ask is that we agree
6 that we won't take a break in between a question and an
7 answer, so that you can answer the question before we
8 take a break. Is that fair?

9 A Okay.

10 Q As you can see, there's water and other
11 beverages available. If you ever need anything during
12 the deposition, feel free to just get up and help
13 yourself. And we'll just go ahead and take a break at
14 that time. Does that all make sense?

15 A Yes.

16 Q Okay. Now, Mr. Norby, is there any reason that
17 you can't testify fully and truthfully today?

18 A No.

19 Q Could you please give us your current home
20 address?

21 A 869 South McKnight Road, St. Paul, Minnesota.

22 Q And how long have you lived at that address?

23 A About eleven years.

24 Q Is that your primary home?

25 A Yes.

1 Q Do you own any other homes?

2 A No.

3 Q And in what states do you pay income taxes?

4 A Minnesota.

5 Q Do you earn income in any other states besides
6 Minnesota?

7 A No.

8 Q Do you own a vehicle?

9 A Yes.

10 Q And where is that vehicle registered?

11 A Minnesota.

12 Q Is that your only vehicle, or do you own more
13 than one?

14 A We have two.

15 Q And where is the second vehicle registered?

16 A Minnesota.

17 Q Where are you registered to vote?

18 A Minnesota.

19 Q Did you go to college, Mr. Norby?

20 A Yes.

21 Q Where did you go?

22 A St. John's University.

23 Q And when did you graduate?

24 A 1984.

25 Q What degree did you earn?

1 you first saw this document?

2 A Oh, within the last month.

3 Q And you understand that you are testifying here
4 today pursuant to this deposition notice?

5 A Correct.

6 Q Okay. You can go ahead and set that aside.

7 Mr. Norby, where are you employed?

8 A I'm employed by St. Paul Public Schools.

9 Q And what is your position?

10 A I am a high school math teacher.

11 Q And how long have you held that position?

12 A In St. Paul?

13 Q Yes, at St. Paul.

14 A About 18 years.

15 Q Okay. And where did you work before then?

16 A Before that I worked in Wausau, Wisconsin.

17 Q Okay. And were you also a teacher there?

18 A Yes.

19 Q Okay. So, Mr. Norby, could you please describe
20 in your own words the claim or claims that you're
21 asserting in this case today?

22 A That I purchased a TV that had a CR tube,
23 cathode ray tube, that was -- well, in the manufacturing
24 of that tube, there was price fix -- price fixing going
25 on among some manufacturers as well as control of

1 And all those pictures that we introduced,
2 Exhibit 443, 444, and 442, those are pictures of the
3 Magnavox television that is the basis of your claims in
4 this case. Is that right?

5 A Yes.

6 Q Where did you purchase that Magnavox
7 television?

8 A At Target.

9 Q And where was that Target located?

10 A Woodbury, Minnesota.

11 Q You mentioned that you purchased it in about
12 January of 2006. Is that correct?

13 A Yes.

14 Q Did you have a receipt for that purchase?

15 A No.

16 Q Do you remember when you disposed of that
17 receipt?

18 A No.

19 Q How did you pay for that television?

20 A With a credit card.

21 Q Do you remember which credit card?

22 A It was our -- yes, a Visa.

23 Q Okay. And did you look for credit card
24 statements from that Visa that would reflect the purchase
25 of this television at Target?

EXHIBIT 29



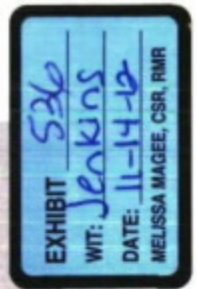
CRT000036

EXHIBIT 534
WIT: Jenkins
DATE: 11-14-12
MELISSA MAGEE, CSR, RMR



CRT000037

EXHIBIT	535
WIT:	Jenkins
DATE:	11-14-12
MELISSA WAGG, CSR, RMR	



CRT000039



EXHIBIT 537
WIT: enkins
DATE: 11-14-12
MELISSA MAGEE, CSR, RMR



EXHIBIT 538
WIT: Jenkins
DATE: 11-14-12
MELISSA MAGEE, CSR, RMR

DURABRAND MODEL NO.DU1301

POWER SOURCE AC 120V 60Hz 54W

CLASSIFICATION : COMPLIES WITH FDA RADIATION
PERFORMANCE STANDARDS, 21 CFR SUBCHAPTER J.

THE DEVICE COMPLIES WITH PART 15 OF THE FCC RULES. OPERATION IS SUBJECT
TO THE FOLLOWING TWO CONDITIONS : (1) THIS DEVICE MAY NOT CAUSE HARMFUL
INTERFERENCE, AND (2) THIS DEVICE MUST ACCEPT ANY INTERFERENCE RECEIVED,
INCLUDING INTERFERENCE THAT MAY CAUSE UNDESIRED OPERATION.

ORION SALES, INC. HIGHWAY 41 ORION PLACE, PRINCETON, INDIANA 47670

MADE IN THAILAND

722595A002



289X



LISTED

VIDEO PRODUCT
E68219 CAT. M3R036

MANUFACTURED : KD

SERIAL NO. :

FEBRUARY

2005

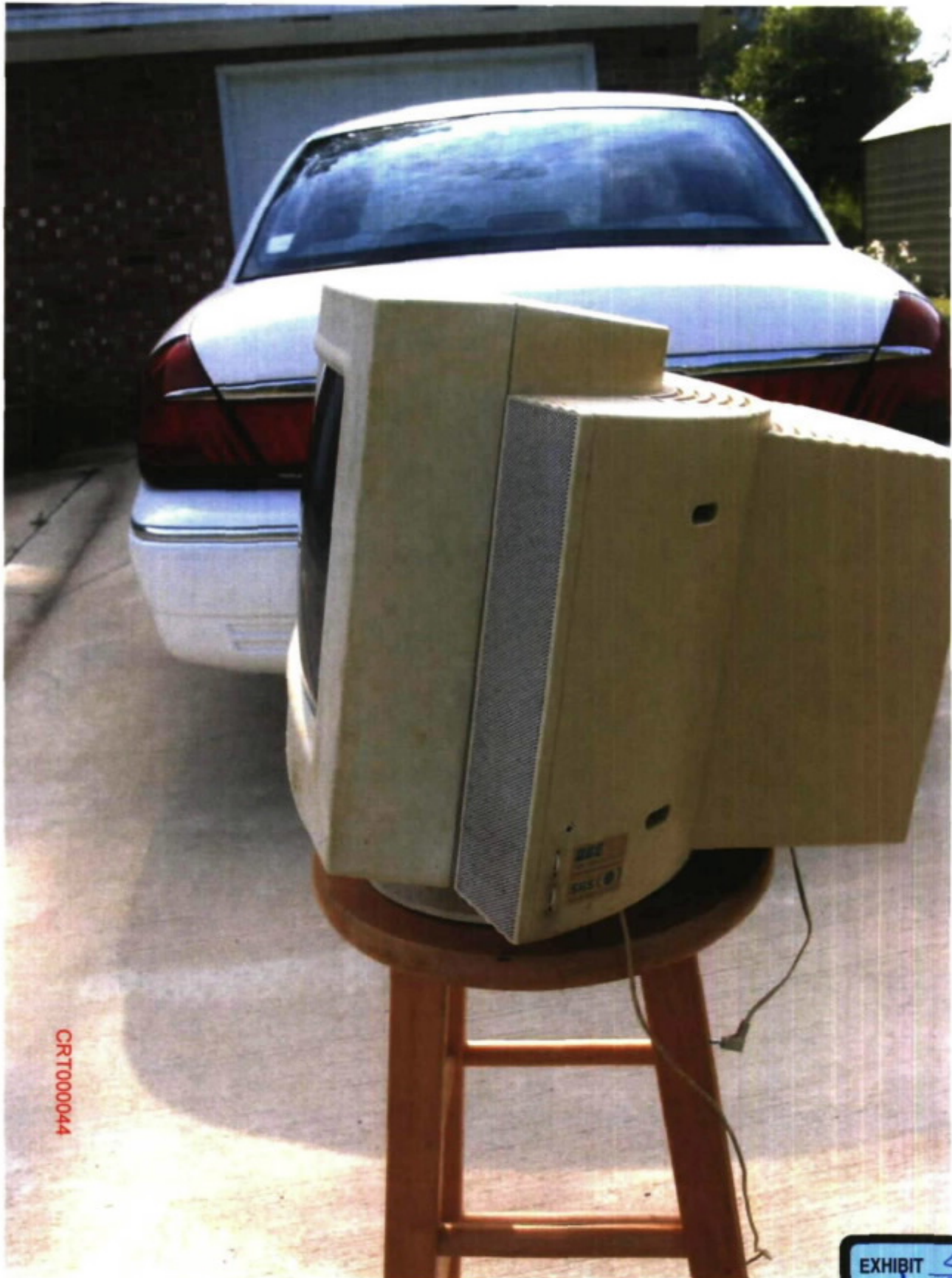


057350211866

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EXHIBIT 539
WIT: Jenkins
DATE: 11-14-12
MELISSA MAGEE, CSR, RMR





CRT000044

EXHIBIT	<u>543</u>
WIT:	<u>Jenkins</u>
DATE:	<u>11-14-12</u>
MELISSA MAGEE, CSR, RMR	



CRT000045

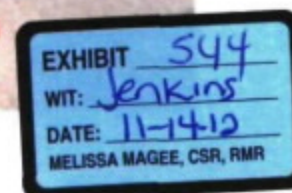


EXHIBIT 30

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION,)
Plaintiff,)
Case No.)
07-5944 SC)
MDL No. 1917)
_____)
_____)
This Document Relates to:)
ALL ACTIONS,)
_____)

VIDEOTAPED DEPOSITION OF CHARLES JENKINS
WEDNESDAY, NOVEMBER 14, 2012

REPORTER: MELISSA MAGEE, CSR, RMR

09:21 1 A Yes, it is.

09:21 2 Q Do you rent or own that home?

09:21 3 A The bank owns it, and I'm paying them
09:21 4 every month.

09:21 5 Q And before that, where did you live?

09:21 6 A I lived on Spruce Street in Columbus,
09:21 7 Mississippi.

09:21 8 Q And how long did you live on Spruce
09:21 9 Street?

09:21 10 A Fifteen years.

09:21 11 Q How long have you lived continuously
09:22 12 in Mississippi?

09:22 13 A Since about 1983.

09:22 14 Q Do you pay taxes in Mississippi?

09:22 15 A Yes, I do.

09:22 16 Q And do you own property in any other
09:22 17 states than Mississippi?

09:22 18 A No.

09:22 19 Q Do you pay taxes in any other state
09:22 20 than Mississippi?

09:22 21 A No.

09:22 22 Q Mr. Jenkins, have you ever been
09:22 23 deposed before this morning?

09:22 24 A No.

09:22 25 Q Have you ever served as a plaintiff in

09:40 1 first. It should say A1. Is that right?

09:40 2 A Yeah.

09:40 3 Q Okay. So turn to page A15.

09:40 4 A Okay. Yes.

09:40 5 Q So does that refresh your recollection
09:40 6 as to whether you provided information that was
09:40 7 used in these interrogatories?

09:40 8 A Yes.

09:40 9 Q Okay.

09:40 10 MS. BYRD: I'm going to do that one
09:40 11 more time with this document.

09:40 12 (EXHIBIT NO. 533 WAS MARKED FOR THE RECORD.)

09:41 13 THE WITNESS: Yes, I think I've seen
09:41 14 this.

09:41 15 BY MS. BYRD:

09:41 16 Q So you believe you've seen this
09:41 17 document before this morning?

09:41 18 A Yes, um-hum.

09:41 19 Q And do you believe you supplied
09:41 20 information that was used in those
09:41 21 interrogatories?

09:41 22 A Yes.

09:41 23 Q Mr. Jenkins, what are the products for
09:41 24 which you're claiming damages in this case?

09:41 25 A Television and a computer monitor.

09:41 1 Q Are you claiming damages for any other
09:41 2 products besides those two?

09:41 3 A No, huh-uh.

09:41 4 Q Okay. So just so you sort of have the
09:41 5 lay of the land here. I'm going to ask you a
09:41 6 series of questions and I'm going to ask you
09:41 7 about each of those individual products one at
09:41 8 a time. So it's going to seem repetitive, but
09:41 9 it's important that we get information about
09:42 10 both of them.

09:42 11 A Right.

09:42 12 Q Okay. Let's take the television
09:42 13 first.

09:42 14 A Um-hum (affirmative response).

09:42 15 Q What exactly did you purchase?

09:42 16 A It was a Durabrand 20-inch television.

09:42 17 Q It's a 20-inch television?

09:42 18 A Well, I'm not -- small television.
09:42 19 16-inch, 12-inch.

09:42 20 Q Okay. So the -- to the best of your
09:42 21 knowledge, it's a small television?

09:42 22 A Um-hum (affirmative response).

09:42 23 Q But you're not sure of the --

09:42 24 A Right, I'm not --

09:42 25 Q -- actual dimensions?

09:42 1 A -- sure of the actual dimensions,

09:42 2 uh-huh.

09:42 3 Q And it's your testimony it's a

09:42 4 Durabrand television?

09:42 5 A Um-hum (affirmative response).

09:42 6 Q Do you know if Durabrand is a
09:42 7 defendant in this case?

09:42 8 A No, I don't know, huh-uh.

09:42 9 Q You don't know one way or the other?

09:42 10 A No.

09:42 11 Q Why did you choose to purchase the
09:42 12 Durabrand television?

09:42 13 A The price range for the size of the
09:42 14 television.

09:42 15 Q So which features of the television
09:42 16 were important to you in selecting that?

09:43 17 A Small and lower price.

09:43 18 Q Do you know if brands other than
09:43 19 Durabrand offered TVs with similar features at
09:43 20 the time you made that purchase?

09:43 21 A No.

09:43 22 Q No you don't know?

09:43 23 A Didn't shop around that much. Just
09:43 24 kind of went to one place and saw that one and
09:43 25 got it.

09:43 1 Q Was the fact that the Durabrand
09:43 2 television contained a cathode ray tube
09:43 3 important to you in making the purchase?

09:43 4 A Not particularly.

09:43 5 Q Did you consider televisions that
09:43 6 contained other technologies?

09:43 7 A No.

09:43 8 Q Do you know what a plasma television
09:43 9 is?

09:43 10 A Yes.

09:43 11 Q Did you consider a plasma?

09:43 12 A No.

09:43 13 Q Did you consider an LCD television?

09:43 14 A No.

09:43 15 Q An LED television?

09:43 16 A No.

09:43 17 Q And where did you make the purchase of
09:43 18 the television?

09:43 19 A Walmart in Columbus, Mississippi.

09:43 20 Q And at the time you made the purchase,
09:44 21 where were you living?

09:44 22 A In Caledonia.

09:44 23 Q And is the Walmart in Columbus --
09:44 24 about how far is the Walmart in Columbus from
09:44 25 your home in Caledonia?

09:47 1 THE WITNESS: Yeah.

09:47 2 BY MS. BYRD:

09:47 3 Q Is that a local. . .

09:47 4 A Yeah, uh-huh, he's a local guy.

09:48 5 Q Okay. And for Hoopers, were you aware
09:48 6 at the time you made your purchase, they
09:48 7 offered other brands or --

09:48 8 A No.

09:48 9 Q -- technologies of televisions? "No"?

09:48 10 A Well, I never did shop there. Didn't
09:48 11 shop there.

09:48 12 Q Do you know if any other retailers
09:48 13 we've just discussed offered televisions that
09:48 14 had similar features to the one you purchased?

09:48 15 A Huh-uh, no.

09:48 16 Q And when did you purchase the
09:48 17 Durabrand television?

09:48 18 A June, '05. 2005.

09:48 19 Q And how do you know that that is when
09:48 20 you purchased it?

09:48 21 A Just from certain things that were
09:48 22 going on at that time and -- helped me to
09:48 23 remember.

09:48 24 Q So you believe that June 2005 is when
09:48 25 you purchased the television just based on your

09:48 1 own recollection?

09:48 2 A Um-hum (affirmative response).

09:48 3 Q And you mentioned that there were
09:48 4 certain things going on at the time. Can you
09:48 5 specify what some of those things were?

09:48 6 A Well, I had just started dating my
09:49 7 girlfriend, and she told me that she couldn't
09:49 8 marry someone until you've been dating them for
09:49 9 two years. And I knew that my son was going to
09:49 10 graduate in 2007, and I had just started dating
09:49 11 her in 2005. So that's kind of how I remember
09:49 12 that.

09:49 13 Q Got you. Okay.

09:49 14 MR. METHVIN: I like it.

09:49 15 BY MS. BYRD:

09:49 16 Q Do you have a receipt for your
09:49 17 Durabrand television?

09:49 18 A No, I don't have -- didn't keep the
09:49 19 receipt.

09:49 20 Q Do you recall what form of payment you
09:49 21 used?

09:49 22 A I wrote a check for it.

09:49 23 Q Did you purchase the television in one
09:49 24 lump sum?

09:49 25 A Yes.

10:10 1 Bell monitor, are you aware of whether other
10:10 2 brands offered monitors with similar features?

10:10 3 A No.

10:10 4 Q Are you aware that -- whether other
10:10 5 brands offered monitors that were priced
10:10 6 similarly to the one you purchased?

10:10 7 A No.

10:10 8 Q Was the fact that your Packard Bell
10:11 9 monitor contained a CRT an important feature to
10:11 10 you when you made the purchase?

10:11 11 A No.

10:11 12 Q I'm sorry?

10:11 13 A No.

10:11 14 Q Did you consider purchasing a monitor
10:11 15 that contained a different technology?

10:11 16 A No.

10:11 17 Q Did you consider purchasing an LCD
10:11 18 monitor, for example?

10:11 19 A No.

10:11 20 Q Where did you purchase the Packard
10:11 21 Bell monitor?

10:11 22 A It was at an electronic retail store
10:11 23 called Rex's Appliances.

10:11 24 Q And where is Rex's located?

10:11 25 A Rex is out of business now. They were

10:11 1 on Highway 45 North in Columbus, Mississippi,
10:11 2 at the time.

10:11 3 Q And where were you living at the time?

10:11 4 A In Columbus, Mississippi.

10:11 5 Q And about how far was Rex's from your
10:11 6 home?

10:11 7 A Probably 7 or 8 miles. Convenient to
10:11 8 the house.

10:11 9 Q And is Rex's a local chain?

10:11 10 A I'm not sure. They were in --
10:12 11 throughout Mississippi, but I'm not sure if
10:12 12 they were regional or national, but they were a
10:12 13 chain.

10:12 14 Q So do you -- do you know how many
10:12 15 locations they had within Mississippi?

10:12 16 A No.

10:12 17 Q Do you know if they had locations in
10:12 18 other states?

10:12 19 A Yes -- no, I don't know if they had
10:12 20 locations in other states, but I think they had
10:12 21 stores, like, in Tupelo and maybe Starkville.

10:12 22 Q Do you know whether Rex's offered
10:12 23 other brand computer monitors at the time you
10:12 24 made your purchase?

10:12 25 A I don't know.

10:16 1 computer monitors containing other technologies
10:16 2 than CRT?

10:16 3 A No.

10:16 4 Q Do you know whether they offered other
10:16 5 brands than Packard Bell?

10:16 6 A No.

10:16 7 Q Okay. I'm going to ask you the same
10:16 8 questions about Sears. Do you know whether
10:16 9 they offered products with similar features?

10:16 10 A I don't know.

10:16 11 Q Do you know whether they offered other
10:16 12 brands?

10:16 13 A I don't know.

10:16 14 Q Or other technologies?

10:16 15 A I don't know.

10:16 16 Q When did you purchase your Packard
10:17 17 Bell monitor?

10:17 18 A November '97.

19 MS. BYRD: What was our most recent
20 exhibit?

21 COURT REPORTER: 533 was the last
22 exhibit.

23 BY MS. BYRD:

10:17 24 Q Would you go back and take a look at
10:17 25 Exhibit 533 for just a moment?

10:17 1 A Um-hum (affirmative response).

10:17 2 Q Do you have that?

10:17 3 A Yeah.

10:17 4 Q Okay. Can I direct you specifically
10:17 5 to Samsung Exhibit B15.

10:17 6 A Okay.

10:17 7 Q Sorry. I know that's a big stack of
10:17 8 papers.

10:18 9 A Yes.

10:18 10 Q Okay. And could you look -- take a
10:18 11 minute to review it, and let me know when
10:18 12 you're ready.

10:18 13 A Okay.

10:18 14 Q Okay. Is there anything contained in
10:18 15 Samsung Exhibit B15 that refreshes your
10:18 16 recollection as to when you purchased the
10:18 17 Packard Bell monitor?

10:18 18 A Anything in here that refreshes my
10:18 19 memory?

10:18 20 Q Yeah.

10:18 21 A Right here it says 11/99.

10:18 22 Q Okay. So is it possible that you
10:18 23 purchased the monitor in 1999 rather than 1997?

10:18 24 A No, I think I bought it in --
10:18 25 that's -- I never told anybody '99. That's

10:19 1 obviously a typographical error.

10:19 2 MR. PAPALE: Okay.

10:19 3 THE WITNESS: '97.

10:19 4 BY MS. BYRD:

10:19 5 Q Okay. So it's your testimony it's
10:19 6 '97?

10:19 7 A Yes.

10:19 8 Q I just wanted to be sure. Okay. And
10:19 9 how do you know that you bought the Packard
10:19 10 Bell in 1997?

10:19 11 A My mother passed away in 1996 and left
10:19 12 an inheritance to her children, which we were
10:19 13 able to get about -- approximately a year after
10:19 14 she passed away, and that is the money that I
10:19 15 used to purchase this computer and monitor
10:19 16 with.

10:19 17 Q Okay. So is it fair to say that your
10:19 18 testimony of when you purchased the Packard
10:19 19 Bell is based on your own recollection?

10:19 20 A Um-hum (affirmative response).

10:19 21 Q Okay. Do you have a receipt?

10:19 22 A No.

10:19 23 Q Do you recall what form of payment you
10:19 24 used to purchase the monitor?

10:19 25 A Cash.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. CV-07-5944 SC

MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**INDIRECT PURCHASER PLAINTIFFS'
AMENDED AND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
DEFENDANT SAMSUNG SDI CO., LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: SAMSUNG SDI CO., LTD.

RESPONDING PARTY: INDIRECT PURCHASER PLAINTIFFS

SET NUMBER: ONE (1-16)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Indirect Purchaser Plaintiffs hereby object and respond to the First Set of Interrogatories propounded by Defendant Samsung SDI Co., Ltd. ("Defendant"), as set forth below.



PRELIMINARY STATEMENT

Each of the following responses is subject to all objections of and concerning relevance, materiality, and admissibility, as well as to all and any other objections on any ground requiring exclusion of any response if introduced in Court. All evidentiary objections and grounds accordingly are expressly reserved. Furthermore, Indirect Purchaser Plaintiffs' decision, now or in the future, to provide information notwithstanding the objectionable nature of the Interrogatories shall not be construed as: (a) an admission that they agree with any of Defendant's definitions or characterizations contained therein, or (b) an admission that the information sought likely will lead to the discovery of admissible evidence, or (c) an agreement that requests for similar information will be treated in a similar manner.

For purposes of these Interrogatories, Indirect Purchaser Plaintiffs define the term "CRT Products" as televisions and computer monitors containing CRTs.

Indirect Purchaser Plaintiffs' objections and responses to the First Set of Interrogatories are made without prejudice to their right to introduce any or all evidence of any kind in this case.

The specific objections and responses set forth below are based upon information now known. Indirect Purchaser Plaintiffs have not yet completed discovery or preparation for trial in this case, and, therefore, reserve the right to amend, modify, or supplement any general or specific objection or response.

Nothing in their objections and responses to these Interrogatories shall be construed as an admission by Indirect Purchaser Plaintiffs with respect to the competence, admissibility, relevance, or materiality of any fact or document, or as an admission of the truth or accuracy of any characterization of any information of any kind sought by these Interrogatories.

Indirect Purchaser Plaintiffs reserve their right to object to use of their objections and responses herein, or the subject matter thereof, on any ground in this or in any subsequent proceeding, including, without limitation, the right to object on any ground at any time to the use of such responses in any discovery procedures in this or any proceeding, and/or at trial.

1 The Indirect Purchaser Plaintiffs' responses to the Interrogatories are subject to the
2 provisions of the Stipulated Protective Order entered by the Court June 18, 2008 (Document
3 306) (the "Protective Order"). The Indirect Purchaser Plaintiffs' Amended and Supplemental
4 Interrogatory Objections and Responses hereby are designated "Confidential" in accordance with
5 the provisions of the Protective Order.

6 Each of the General Objections herein is considered applicable to and is hereby
7 incorporated into each and every response by Plaintiffs to the Interrogatories, and each response
8 is given without waiving any of the General Objections. The assertion of any General Objection
9 in response to any Interrogatory should not be considered a waiver of the remaining General
10 Objections. By making the responses herein, Plaintiffs do not concede that the information
11 provided is relevant to the claims or defenses of any party or reasonably calculated to lead to the
12 discovery of admissible evidence.

13 GENERAL OBJECTIONS

14 1. Indirect Purchaser Plaintiffs object to, and will not answer, the Interrogatories to
15 the extent they seek discovery of information, legal analysis, and/or strategies concerning any
16 Class Certification motion Indirect Purchaser Plaintiffs may file under Rule 23 of the Federal
17 Rules of Civil Procedure. Such information, legal analysis, and/or strategies are protected from
18 disclosure by the attorney-client privilege and/or the work-product doctrine.

19 2. Indirect Purchaser Plaintiffs object to, and will not answer, the Interrogatories to
20 the extent Defendant intends or purports to impose obligations beyond those required or
21 permitted by the Federal Rules of Civil Procedure and the Local Rules of the Northern District of
22 California, or to the extent they are outside the scope of any order or opinion of this Court or of
23 the Special Master, or contrary to any applicable rules of law.

24 3. Indirect Purchaser Plaintiffs object to, and will not answer, the Interrogatories to
25 the extent they comprise premature "contention interrogatories," the answers to which are
26 dependent on merits and/or expert discovery. Pursuant to Rule 33(a)(2) of the Federal Rules of
27 Civil Procedure, Indirect Purchaser Plaintiffs, as necessary or appropriate, will respond to proper
28

1 “contention interrogatories” after merits and expert discovery is complete, and/or after some
2 other time as directed by the Court or Special Master. *See, e.g., In re Convergent Technologies*
3 *Securities Litigation*, 108 F.R.D. 328, 336 (N.D. Cal. 1985) (“There is considerable recent
4 authority for the view that the wisest general policy is to defer propounding and answering
5 contention interrogatories until near the end of the discovery period.”); *In re eBay Seller*
6 *Antitrust Litigation*, No. C 07-1882 JF (RS), 2008 WL 5212170, at *1 (N.D. Cal. Dec. 11, 2008)
7 (“Courts using their Rule 33(a)(2) discretion generally disfavor contention interrogatories asked
8 before discovery is undertaken.”).

9 4. Indirect Purchaser Plaintiffs object to the Interrogatories, including the
10 Definitions and Instructions set forth therein, to the extent (a) they seek to elicit information
11 relating or referring to matters not raised by the pleadings, or (b) they seek to elicit information
12 that is not relevant to the claims or defenses of the parties to this action, or (c) they seek to elicit
13 information that is not within Indirect Purchaser Plaintiffs’ possession, custody, or control, or (d)
14 they seek to elicit information not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 5. Indirect Purchaser Plaintiffs object to, and will not answer, the Interrogatories to
17 the extent they seek information protected by the attorney-client privilege, work-product
18 doctrine, or any other applicable privilege, protection, immunity, or rule (collectively,
19 “Privileged Information”), including, without limitation, information concerning
20 communications between Indirect Purchaser Plaintiffs’ attorneys, and/or between Indirect
21 Purchaser Plaintiffs and their attorneys, made during, or in anticipation of, litigation. Any
22 inadvertent disclosure of such information is not intended to, and shall not, constitute a general
23 or specific waiver, in whole or in part, of the foregoing privileges or immunities, or the subject
24 matter thereof. Relatedly, any inadvertent disclosure of such information is not intended to, nor
25 shall it, constitute a waiver of the right to object to any use of such information, and any such
26 disclosure shall be treated as specified in Rule 26(b)(5)(B) of the Federal Rules of Civil
27 Procedure.

1 6. Indirect Purchaser Plaintiffs object to, and will not answer, the Interrogatories to
2 the extent that (a) they seek the premature disclosure of expert material subject to Rule
3 26(a)(2)(C) of the Federal Rules of Civil Procedure, and/or (b) they seek disclosure of
4 information concerning any person or entity whom Indirect Purchaser Plaintiffs will not
5 designate as an opinion or other witness at trial.

6 7. Indirect Purchaser Plaintiffs object to the Interrogatories, including the
7 Definitions and Instructions set forth therein, to the extent they seek information that is equally
8 accessible to Defendant as it is to Indirect Purchaser Plaintiffs, or that has been provided by other
9 parties or witnesses.

10 8. Indirect Purchaser Plaintiffs object to the Interrogatories, including the
11 Definitions and Instructions set forth therein, to the extent they are cumulative to or duplicative
12 of other Interrogatories.

13 9. Indirect Purchaser Plaintiffs object to, and will not answer, the Interrogatories to
14 the extent that they seek confidential or proprietary business information and research.

15 10. Indirect Purchaser Plaintiffs object to the purported definition of the terms
16 "YOU" and "YOUR" because they are vague, ambiguous, overly broad, and unduly
17 burdensome, as they seek information that is neither relevant nor reasonably calculated to lead to
18 the discovery of admissible information. Responding further, Indirect Purchaser Plaintiffs object
19 to the inclusion of "agents, attorneys, representatives, or other persons acting or purporting to act
20 on behalf of the responding Plaintiff," within this Definition to the extent it purports to
21 encompass information that is protected by attorney-client privilege and/or work-product
22 doctrine, or any other applicable privilege, protection, immunity, or rule.

23 11. Indirect Purchaser Plaintiffs object to the purported definition of the term
24 "DOCUMENT" to the extent it attempts to impose burdens on them greater than or inconsistent
25 with those imposed by the Federal Rules of Civil Procedure or the Local Rules for the United
26 States District Court for the Northern District of California.

27 12. Indirect Purchaser Plaintiffs object to the purported definition of the term
28

1 "COMPLAINT" as overly broad to the extent it is construed to refer to any Complaint other than
 2 Indirect Purchaser Plaintiffs' Third Consolidated Amended Complaint filed December 11, 2010
 3 in the United States District Court for the Northern District of California.

4 13. Indirect Purchaser Plaintiffs object to the Interrogatories, including the
 5 Definitions and Instructions set forth therein, to the extent any one or more or all of them assume
 6 disputed facts or legal conclusions. Any response or objection herein is without prejudice to this
 7 objection and Indirect Purchaser Plaintiffs' right to dispute such purported facts or legal
 8 conclusions.

9 **SPECIFIC OBJECTIONS AND RESPONSES**

10 **INTERROGATORY NO. 1:**

11 IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR
 12 responses to these interrogatories.

13 **RESPONSE NO. 1:**

14 In addition to their General Objections listed above, Indirect Purchaser Plaintiffs object to
 15 Interrogatory No. 1 because it calls for the disclosure of privileged information, including
 16 without limitation, information subject to the attorney-client privilege and/or the work product
 17 doctrine. Indirect Purchaser Plaintiffs also object to Interrogatory No. 1 because it seeks
 18 information that is neither relevant nor reasonably calculated to lead to the discovery of
 19 admissible evidence.

20 Subject to and without waving the objections stated above, Indirect Purchaser Plaintiffs
 21 respond by referring to Samsung Exhibit A-1 through A-25.

22 **INTERROGATORY NO. 2:**

23 Separately identify each acquisition of a CRT upon which YOU base any claim in this
 24 action, including without limitation the date and place of acquisition, the type and manufacturer
 25 of each CRT acquired, and the IDENTITY of each PERSON involved in the acquisition and the
 26 time period and nature of each PERSON'S involvement.

27 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
 28

1 YOUR response.

2 **RESPONSE NO. 2:**

3 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
4 Interrogatory No. 2 because the term "acquisition" is vague, ambiguous, and overly broad.

5 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
6 respond by stating that they are end users of CRT Products and did not acquire any stand-alone
7 CRTs during the relevant period.

8 **INTERROGATORY NO. 3:**

9 Separately identify each acquisition of a CRT PRODUCT upon which YOU base any
10 claim in this action, including without limitation the date and place of acquisition, the type and
11 manufacturer of each CRT PRODUCT acquired, and the IDENTITY of each PERSON involved
12 in the acquisition and the time period and nature of each PERSON'S involvement.

13 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
14 YOUR response.

15 **RESPONSE NO. 3:**

16 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
17 Interrogatory No. 3 because the term "acquisition" is vague, ambiguous, and overly broad.

18 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
19 respond by stating that they purchased CRT Products containing CRTs. Responding further,
20 Indirect Purchaser Plaintiffs refer to Samsung Exhibit B-1 through B-25.

21 **INTERROGATORY NO. 4:**

22 For each acquisition of a CRT identified in Interrogatory No. 2, state all terms and
23 conditions that were a part of the acquisition, including without limitation all terms and
24 conditions RELATING TO pricing, taxes, tariffs, duties, freight charges, or any other fees paid
25 by any PERSON in connection with the acquisition.

26 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
27 YOUR response.

1 **RESPONSE NO. 4:**

2 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
3 Interrogatory No. 4 because the term “acquisition” is vague, ambiguous, and overly broad.

4 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
5 respond by stating that they are end users of CRT Products and did not acquire any stand-alone
6 CRTs during the relevant period.

7 **INTERROGATORY NO. 5:**

8 For each acquisition of a CRT PRODUCT identified in Interrogatory No. 3, state all
9 terms and conditions that were a part of the acquisition, including without limitation all terms
10 and conditions RELATING TO pricing, taxes, tariffs, duties, freight charges, or any other fees
11 paid by any PERSON in connection with the acquisition.

12 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
13 YOUR response.

14 **RESPONSE NO. 5:**

15 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
16 Interrogatory No. 5 because the term “acquisition” is vague, ambiguous, and overly broad.

17 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
18 respond by referring to Samsung Exhibit B-1 through B-25.

19 **INTERROGATORY NO. 6:**

20 For each acquisition of a CRT identified in Interrogatory No. 2, state whether the CRT
21 was acquired as part of a system or other bundled product (e.g., a CRT computer monitor
22 acquired in conjunction with a computer, keyboard, speakers, warranty, service plan, or other
23 services) and, if so, the value of each component of such system or bundled product.

24 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
25 YOUR response.

26 **RESPONSE NO. 6:**

27 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
28

1 Interrogatory No. 6 because (a) the term “acquisition” and the phrase “acquired as part of a
2 system or other bundled product (e.g., a CRT computer monitor acquired in conjunction with a
3 computer, keyboard, speakers, warranty, service plan, or other services)” are vague, ambiguous,
4 overly broad, and unduly burdensome, and (b) it seeks information that is neither relevant nor
5 reasonably calculated to lead to the discovery of admissible evidence. Responding further, to the
6 extent Defendant seeks discovery related to “the value of each component of such system or
7 bundled product,” Indirect Purchaser Plaintiffs also object to Interrogatory No. 6 because it (a)
8 prematurely seeks to elicit prior to merits discovery legal theories, analysis, and other matters on
9 which opinion testimony may be required at trial, (b) purports to require a layperson to provide
10 answers on matters as to which opinion testimony may be required at trial, and (c) calls for legal
11 conclusions and compels the assumption of facts not yet in evidence, and (d) prematurely seeks
12 disclosure of expert material subject to Rule 26(a)(2)(C) of the Federal Rules of Civil Procedure.

13 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
14 respond by stating that they are end users of CRT Products and did not acquire any stand-alone
15 CRTs during the relevant period.

16 **INTERROGATORY NO. 7:**

17 For each acquisition of a CRT PRODUCT identified in Interrogatory No. 3, state whether
18 the CRT PRODUCT was acquired as part of a system or other bundled product (e.g., a CRT
19 computer monitor acquired in conjunction with a computer, keyboard, speakers, warranty,
20 service plan, or other services) and, if so, the value of each component of such system or bundled
21 product.

22 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
23 YOUR response.

24 **RESPONSE NO. 7:**

25 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
26 Interrogatory No. 7 because (a) the term “acquisition” the phrase “acquired as part of a system or
27 other bundled product (e.g., a CRT computer monitor acquired in conjunction with a computer,
28

1 keyboard, speakers, warranty, service plan, or other services)” are vague, ambiguous, overly
2 broad, and unduly burdensome, and (b) it seeks information that is neither relevant nor
3 reasonably calculated to lead to the discovery of admissible evidence. Responding further, to the
4 extent Defendant seeks discovery related to “the value of each component of such system or
5 bundled product,” Indirect Purchaser Plaintiffs also object to Interrogatory No. 7 because it (a)
6 prematurely seeks to elicit prior to merits discovery legal theories, analysis, and other matters on
7 which opinion testimony may be required at trial, (b) purports to require a layperson to provide
8 answers on matters as to which opinion testimony may be required at trial, and (c) calls for legal
9 conclusions and compels the assumption of facts not yet in evidence, and (d) prematurely seeks
10 disclosure of expert material subject to Rule 26(a)(2)(C) of the Federal Rules of Civil Procedure.

11 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
12 respond by referring to Samsung Exhibit B-1 through B-25.

13 **INTERROGATORY NO. 8:**

14 For each acquisition of a CRT identified in Interrogatory No. 2, identify any warranties,
15 servicing plans or agreements, membership rewards, or other benefits received by YOU
16 RELATING TO the acquisition.

17 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
18 YOUR response.

19 **RESPONSE NO. 8:**

20 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
21 Interrogatory No. 8 because (a) the terms “servicing plans or agreements, membership rewards,
22 or other benefits” are vague, ambiguous, and overly broad, and (b) it seeks information that is
23 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
25 respond by stating that they are end users of CRT Products and did not acquire any stand-alone
26 CRTs during the relevant period.

1 **INTERROGATORY NO. 9:**

2 For each acquisition of a CRT PRODUCT identified in Interrogatory No. 3, identify any
3 warranties, servicing plans or agreements, membership rewards, or other benefits received by
4 YOU RELATING TO the acquisition.

5 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports
6 YOUR response.

7 **RESPONSE NO. 9:**

8 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
9 Interrogatory No. 9 because (a) the terms “servicing plans or agreements, membership rewards,
10 or other benefits” are vague, ambiguous, and overly broad, and (b) it seeks information that is
11 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

12 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
13 respond by referring to Samsung Exhibit B-1 through B-25.

14 **INTERROGATORY NO. 10:**

15 Identify the purpose(s) for which YOU acquired each CRT during the RELEVANT
16 PERIOD, including without limitation whether the CRT was acquired for resale and, if so,
17 whether and under what terms and conditions it was resold.

18 **RESPONSE NO. 10:**

19 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
20 Interrogatory No. 10 because it seeks information that is neither relevant nor reasonably
21 calculated to lead to the discovery of admissible evidence.

22 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
23 respond by stating that they are end users of CRT Products and did not acquire any stand-alone
24 CRTs during the relevant period.

25 **INTERROGATORY NO. 11:**

26 Identify the purpose(s) for which YOU acquired each CRT PRODUCT during the
27 RELEVANT PERIOD, including without limitation whether the CRT PRODUCT was acquired
28

1 for resale and, if so, whether and under what terms and conditions it was resold.

2 **RESPONSE NO. 11:**

3 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
4 Interrogatory No. 11 because it seeks information that is neither relevant nor reasonably
5 calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
7 respond by stating that, as end users, they purchased CRT Products for their own use and not for
8 resale. Indirect Purchase Plaintiffs also respond by referring to Samsung Exhibit B-1 through B-
9 25.

10 **INTERROGATORY NO. 12:**

11 IDENTIFY all PERSONS with knowledge of the factors that influenced each of YOUR
12 decisions to acquire or not to acquire CRTs during the RELEVANT PERIOD.

13 **RESPONSE NO. 12:**

14 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
15 Interrogatory No. 12 because (a) it seeks information that is neither relevant nor reasonably
16 calculated to lead to the discovery of admissible evidence, and (b) it is harassing and invasive.

17 Subject to and without waiving the objections stated above, Indirect Purchase Plaintiffs
18 respond by stating that they are end users of CRT Products and did not consider acquiring any
19 stand-alone CRTs during the relevant period.

20 **INTERROGATORY NO. 13:**

21 IDENTIFY all PERSONS with knowledge of the factors that influenced each of YOUR
22 decisions to acquire or not to acquire CRT PRODUCTS during the RELEVANT PERIOD.

23 **RESPONSE NO. 13:**

24 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
25 Interrogatory No. 13 because (a) it seeks information that is neither relevant nor reasonably
26 calculated to lead to the discovery of admissible evidence, and (b) it is harassing and invasive.

27 Subject to and without waiving the objections stated above, Indirect Purchase Plaintiffs

1 respond by referring to Samsung Exhibit B-1 through B-25.

2 **INTERROGATORY NO. 14:**

3 IDENTIFY all trade publications, advertisements, or news articles RELATING TO the
4 price or product features of CRTs that YOU reviewed during the RELEVANT PERIOD.

5 **RESPONSE NO. 14:**

6 In addition to their General Objections listed above, Indirect Purchaser Plaintiffs object to
7 Interrogatory No. 14 because (a) the terms "all trade publications, advertisements, or news
8 articles" are vague, ambiguous, and overly broad, and (b) it seeks information that is neither
9 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
11 respond by referring to Samsung Exhibit D-1 through D-25.

12 **INTERROGATORY NO. 15:**

13 IDENTIFY all trade publications, advertisements, or news articles RELATING TO the
14 price or product features of CRT PRODUCTS that YOU reviewed during the RELEVANT
15 PERIOD.

16 **RESPONSE NO. 15:**

17 In addition to their General Objections listed above, Indirect Purchaser Plaintiffs object to
18 Interrogatory No. 15 because (a) the terms "all trade publications, advertisements, or news
19 articles" are vague, ambiguous, and overly broad, and (b) it seeks information that is neither
20 relevant nor reasonably calculated to lead to the discovery of admissible evidence.

21 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
22 respond by referring to Samsung Exhibit D-1 through D-25.

23 **INTERROGATORY NO. 16:**

24 State whether, at any time during the RELEVANT PERIOD, YOU elected to acquire a
25 non-CRT television or computer monitor instead of a CRT PRODUCT and, if so, identify
26 YOUR reasons for making each such acquisition.

27

28

1 **RESPONSE NO. 16:**

2 In addition to the General Objections listed above, Indirect Purchaser Plaintiffs object to
3 Interrogatory No. 16 because (a) the terms “elected to acquire” are vague, ambiguous, and overly
4 broad and (b) it seeks information that is neither relevant nor reasonably calculated to lead to the
5 discovery of admissible evidence.

6 Subject to and without waiving the objections stated above, Indirect Purchaser Plaintiffs
7 respond by referring to Samsung Exhibit E-1 through E-25.

8
9 Dated: August 31, 2011

By: /s/ Mario N. Alioto

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20 *Indirect Purchaser Plaintiffs*
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SAMSUNG EXHIBIT B1

PLAINTIFF JERRY COOK

Mr. Cook's claims have been dismissed.

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SAMSUNG EXHIBIT B2

PLAINTIFF BRIAN LUSCHER

1. **CRT PRODUCT:** Philips HDTV
2. **DATE OF PURCHASE:** 8/15/01
3. **LOCATION of PURCHASE:** Costco Wholesale – Tempe, Arizona
4. **PERSONS INVOLVED IN PURCHASE:** Brian Luscher (plaintiff)
5. **PRICE:** \$549.99
6. **TAXES/FEES:** \$44.55
7. **BUNDLE:** Not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000014.

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SAMSUNG EXHIBIT B3

PLAINTIFF JEFFREY FIGONE

1. **CRT PRODUCT:**
 - a. Sharp television – Model Number: 13K-M100
 - b. Panasonic television – Model Number: C1332W
2. **DATE OF PURCHASE:**
 - a. 1999 or 2000
 - b. 2002 or 2003
3. **LOCATION of PURCHASE:**
 - a. Target
 - b. Target
4. **PERSONS INVOLVED IN PURCHASES:** Jeffrey Figone (plaintiff)
5. **PRICE:**
 - a. Not available.
 - b. Not available.
6. **TAXES/FEES:** *The standard sales tax was applied to the purchases of the televisions.*
7. **BUNDLE:** Neither of the televisions were purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000000157-167.

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SAMSUNG EXHIBIT B4

PLAINTIFF CARMEN GONZALEZ

1. **CRT PRODUCT:** Hitachi television - S/N: 61SBX59B
2. **DATE OF PURCHASE:** 12/20/1999
3. **LOCATION of PURCHASE:** Circuit City, 5353 Almaden Expy, San Jose, CA 95118
4. **PERSONS INVOLVED IN PURCHASE:** Carmen Gonzalez (plaintiff)
5. **PRICE:** \$2,250 (approximate)
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** The television was purchased along with a two-year warranty for \$294.99. This warranty was extended every two years until Circuit City ceased business operations.
9. **PURPOSE of PURCHASE:** Personal use.

See also 000019-27 and CRT000419-496.

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SAMSUNG EXHIBIT B5

PLAINTIFF DANA ROSS

1. **CRT PRODUCT:**
 - a. Panasonic 21" Television
 - b. Panasonic 35" Television
2. **DATE OF PURCHASE:** Both televisions were purchased in 2004.
3. **LOCATION of PURCHASE:** Both televisions were purchased at the Panasonic store at Universal Studios, Hollywood.
4. **PERSONS INVOLVED IN PURCHASE:** Dana Ross (plaintiff)
5. **PRICE:**
 - a. \$150 (approximately)
 - b. \$600-650 (approximately)
6. **TAXES/FEES:** The standard sales tax was applied to the purchases of the televisions.
7. **BUNDLE:** Neither television was purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000054-59 and CRT000562.

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SAMSUNG EXHIBIT B6

PLAINTIFF STEVEN GANZ

1. **CRT PRODUCT:**
 - a. 27" Phillips Television
 - b. 27" Toshiba Television
2. **DATE OF PURCHASE:**
 - a. May 22, 2001
 - b. May 2, 2005
3. **LOCATION of PURCHASE:**
 - a. Costco Wholesale – El Camino #475, South San Francisco, California
 - b. Best Buy - Colma, California
4. **PERSONS INVOLVED IN PURCHASE:** Steven Ganz (plaintiff)
5. **PRICE:**
 - a. \$279.99
 - b. \$329.99
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the televisions.
7. **BUNDLE:** Neither television was purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000239-371.

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SAMSUNG EXHIBIT B7

PLAINTIFF BRADY LANE COTTON

1. **CRT PRODUCT:** Magnavox Television
2. **DATE OF PURCHASE:** 2005
3. **LOCATION of PURCHASE:** Either Best Buy or Walmart
4. **PERSONS INVOLVED IN PURCHASE:** Brady Lane Cotton (plaintiff) and Amy Cotton (plaintiff's wife)
5. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
6. **PRICE:** Not available.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000009-13.

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SAMSUNG EXHIBIT B8

PLAINTIFF COLLEEN SOBOTKA

1. **CRT PRODUCT:**
 - a. Sharp television
 - b. JVC television
2. **DATE OF PURCHASE:**
 - a. 2004
 - b. 2000 or 2001
3. **LOCATION of PURCHASE:**
 - a. Eglin Air Force Exchange - Eglin Air Force Base
 - b. Hurlburt Exchange - Hurlburt Field, Florida
4. **PERSONS INVOLVED IN PURCHASES:** Colleen Sobotka (plaintiff)
5. **PRICE:**
 - a. Not available.
 - b. Not available.
6. **TAXES/FEES:** No taxes or fees were applied to the purchase of either television.
7. **BUNDLE:** Neither television was purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000046-50.

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SAMSUNG EXHIBIT B9

PLAINTIFF DANIEL RIEBOW

1. **CRT PRODUCT:** Panasonic 27" television
2. **DATE OF PURCHASE:** 4/22/04
3. **LOCATION of PURCHASE:** Sears, Ala Moana Store, Hawaii
4. **PERSONS INVOLVED IN PURCHASE:** Daniel Riebow (plaintiff)
5. **PRICE:** \$233.89
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** There was an extended warranty in connection with the purchase of this television.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000063-70.

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SAMSUNG EXHIBIT B10

PLAINTIFF TRAVIS BURAU

1. **CRT PRODUCT:** TruTech television
2. **DATE OF PURCHASE:** Approximately 2006
3. **LOCATION of PURCHASE:** Target - Cedar Rapids, IA
4. **PERSONS INVOLVED IN PURCHASE:** Travis Burau (plaintiff)
5. **PRICE:** \$200 (approximately)
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000372.

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SAMSUNG EXHIBIT B11

PLAINTIFF SOUTHERN OFFICE SUPPLY

1. CRT PRODUCT:

- a. AOC computer monitor – S/N: P7732OROSBTBD
- b. GEM computer monitor –S/N: GRNAM94329767
- c. GEM computer monitor - S/N: GRNAM94329488
- d. KDS computer monitor - S/N: 6XB1C19162
- e. AOC computer monitor – S/N: D761VACOSPN2
- f. AOC computer monitor – S/N: D760TACOSPNB
- g. ORION computer monitor – S/N: Unknown

2. DATE OF PURCHASE:

- a. 2/02/2000
- b. 3/17/2000
- c. 3/31/2000
- d. 5/22/2000
- e. 11/16/2000
- f. 2/13/2003
- g. 4/24/2003

3. LOCATION of PURCHASE: All computer monitors were purchased from Elite Technology, Inc. in Kansas City, Kansas.

4. PERSONS INVOLVED IN PURCHASE: Tony McKee (owner of Southern Office Supply)

5. PRICE:

- a. \$183.00
- b. \$189.00
- c. \$189.00
- d. \$181.00
- e. \$163.00
- f. \$119.00
- g. \$98.00

6. TAXES/FEES: There were no taxes or fees applied to any purchase of the computer monitors. Freight charges were paid COD.

7. BUNDLE: Except as to the Orion computer monitor, all other monitors were purchased separately and not as part of a bundle or system. The Orion computer monitor (g) was purchased as part of a bundled system.

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8. **WARRANTIES:** All parts had a 1 year warranty except CPU parts had 25 days excluding physical damage.

9. **PURPOSE of PURCHASE:** Use within business and not for resale.

See also CRT000222-238.

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SAMSUNG EXHIBIT B12

PLAINTIFF CHAD KLEBS

1. **CRT PRODUCT:** Insignia Television – M/N: IS-TV040920; S/N: T18527147
2. **DATE OF PURCHASE:** 6/05
3. **LOCATION of PURCHASE:** Best Buy - Omaha, Nebraska
4. **PERSONS INVOLVED IN PURCHASES:** Chad Klebs (plaintiff)
5. **PRICE:** Not available.
6. **TAXES/FEEs:** The standard sales taxes were applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000028-35.

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SAMSUNG EXHIBIT B13

PLAINTIFF DAVID NORBY

1. **CRT PRODUCT:** Magnavox television – S/N: YA1A0634025035
2. **DATE OF PURCHASE:** 1/06
3. **LOCATION of PURCHASE:** Target
4. **PERSONS INVOLVED IN PURCHASE:** David Norby (plaintiff)
5. **PRICE:** Not available.
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000015-16 and CRT000071-72.

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SAMSUNG EXHIBIT B14

PLAINTIFF RYAN RIZZO

1. **CRT PRODUCT:** Toshiba television – S/N: 80664856
2. **DATE OF PURCHASE:** Approximately 1998
3. **LOCATION of PURCHASE:** Best Buy – Iowa City, Iowa
4. **PERSONS INVOLVED IN PURCHASE:** Ryan Rizzo (plaintiff)
5. **PRICE:** \$700 (approximately)
6. **TAXES/FEES:** The standard sales tax was applied to the purchases of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000214-216.

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SAMSUNG EXHIBIT B15

PLAINTIFF CHARLES JENKINS

1. CRT PRODUCT:

- a. Durabrand 12" television
- b. Packard Bell computer monitor

2. DATE OF PURCHASE:

- a. 6/05
- b. 11/99

3. LOCATION of PURCHASE:

- a. Walmart – Columbus, Mississippi
- b. Rex's – Columbus, Mississippi

4. PERSONS INVOLVED IN PURCHASE:

- a. Charles Jenkins (plaintiff) & Margie Canon (plaintiff's girlfriend at the time)
- b. Charles Jenkins (plaintiff) & Angie Jenkins (plaintiff's former wife)

5. PRICE:

- a. Not available.
- b. Not available.

6. TAXES/FEES: The standard sales tax was applied to the purchase of the television and the computer monitor.

7. BUNDLE: The television was not purchased as part of a bundle or system. The computer monitor was purchased as part of a bundle.

8. WARRANTIES: *None other than any standard manufacturers' warranties.*

9. PURPOSE of PURCHASE: Personal use.

See also CRT000036-45.

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SAMSUNG EXHIBIT B16

PLAINTIFF DANIEL HERGERT

1. **CRT PRODUCT:** Panasonic television – S/N: LC02570860
2. **DATE OF PURCHASE:** 2000
3. **LOCATION of PURCHASE:** Best Buy – Lincoln, Nebraska
4. **PERSONS INVOLVED IN PURCHASE:** Daniel Hergert (plaintiff)
5. **PRICE:** Not available.
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranty.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000060-62.

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SAMSUNG EXHIBIT B17

PLAINTIFF SAMUEL NASTO

1. **CRT PRODUCT:** Panasonic 42" Cinema Vision television
2. **DATE OF PURCHASE:** 2/19/2003
3. **LOCATION of PURCHASE:** Circuit City – Las Vegas, Nevada
4. **PERSONS INVOLVED IN PURCHASE:** Samuel Nasto (plaintiff)
5. **PRICE:** \$1,469.98
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
7. **BUNDLE:** The television was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000217-221.

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SAMSUNG EXHIBIT B18

PLAINTIFF CRAIG STEPHENSON

1. **CRT PRODUCT:** MAG Technology computer monitor – S/N: FXHA 1709 1973U
2. **DATE OF PURCHASE:** 5/20/01
3. **LOCATION of PURCHASE:** Best Buy, 338 W, Albuquerque, New Mexico
4. **PERSONS INVOLVED IN PURCHASE:** Craig Stephenson (plaintiff)
5. **PRICE:** \$57.13 (including tax)
6. **TAXES/FEES:** The standard sales tax was applied to the purchase of the computer monitor.
7. **BUNDLE:** The computer monitor was not purchased as part of a bundle or system.
8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000051-53.

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SAMSUNG EXHIBIT B19

PLAINTIFF GARY HANSON

1. CRT PRODUCT:

- a. RCA Television - S/N: S536412180
- b. Toshiba Television – S/N: A2468602D
- c. RCA Television – S/N: D384C72C7
- d. Dell Computer Monitor – Model Number E772c; S/N: CN 09M556-64180-317-03YX
- e. Dell Computer Monitor – Model Number E772c; S/N: CN 09M556-64180-338-006R

2. DATE OF PURCHASE:

- a. 1995
- b. November or December 2002
- c. 2003
- d. April 2003
- e. April 2003

3. LOCATION of PURCHASE:

- a. Best Buy – Fargo, North Dakota
- b. Target/Best Buy/Wal-Mart – Fargo, North Dakota
- c. Target – Fergus Falls, Minnesota
- d. Dell
- e. Dell

4. PERSONS INVOLVED IN PURCHASE: Gary Hanson (plaintiff)

5. PRICE:

- a. Not available
- b. Not available
- c. Not available
- d. \$770.00 (including computer and other items)
- e. \$770.00 (including computer and other items)

6. TAXES/FEES: The standard sales tax was applied to the purchases of the televisions. Mr. Hanson was charged \$7.41 in taxes in connection with each monitor purchase.

7. BUNDLE: None of the televisions were purchased as part of a bundle or system. Both computer monitors were part of a bundle.

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8. **WARRANTIES:** For the televisions, none other than any standard manufacturers' warranties. The computer monitors came with a 1 year limited warranty, and Mr. Hanson received a \$100 rebate in connection with both monitor purchases.

9. **PURPOSE of PURCHASE:** Personal use.

See also CRT000106-156 and CRT000497-504.

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SAMSUNG EXHIBIT B20

PLAINTIFF DONNA MARIE ELLINGSON

1. CRT PRODUCT:

- a. e-Machines computer monitor
- b. 25" Sharp television
- c. 27" Sharp television

2. DATE OF PURCHASE:

- a. 3/6/04
- b. 11/9/97
- c. 10/18/99

3. LOCATION of PURCHASE:

- a. Best Buy – Rapid City, South Dakota
- b. Rex TV & Appliance – Rapid City, SD
- c. Rex TV & Appliance – Rapid City, SD

4. PERSONS INVOLVED IN PURCHASE: With respect to the computer monitor purchase: Donna Ellingson (plaintiff) & Russ Penning (plaintiff's friend). With respect to the television purchases: Donna Ellingson (plaintiff).

5. PRICE:

- a. \$209.99
- b. \$306.34 (including tax)
- c. \$348.69 (including tax)

6. TAXES/FEES: The standard sales tax was applied to all purchases.

7. BUNDLE: Neither of the televisions were purchased as part of a bundle or system. The computer monitor was part of a bundle.

8. WARRANTIES: Ms. Ellingson received Best Buy Reward Points for her purchase of the e-Machines computer. She does not recall any other specific warranties (other than any standard manufacturers' warranties), servicing plans or agreements, membership rewards, or other benefits received relating to this acquisition. She does not recall if she ever utilized the rewards points. Ms. Ellingson also received a \$100 rebate on the monitor. With respect to the televisions, there were no warranties other than any standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000075-103 and CRT000525-561.

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SAMSUNG EXHIBIT B21

PLAINTIFF FRANK WARNER

1. CRT PRODUCT:

- a. Compaq V720 computer monitor – S/N: 208CL26EC596
- b. Pixie 15" computer monitor - S/N: czc00807130
- c. Pixie 15" computer monitor - S/N: czc0807126
- d. KDS 14" computer monitor – UPC: 0781257141028
- e. KDS 17" computer monitor – UPC: 0088698200087
- f. AOC Color Monitor CT720G – S/N: K1PN4CA871647

2. DATE OF PURCHASE:

- a. After 2/02
- b. 10/23/00
- c. 10/23/00
- d. 3/18/98
- e. 4/5/99
- f. Not available

3. LOCATION of PURCHASE:

- a. Not available
- b. Comp USA, 3539 Riverdale Road, Memphis, TN 38115
- c. Comp USA, 3539 Riverdale Road, Memphis, TN 38115
- d. Ingram Micro TLP, 3820 Micro Drive, Millington, TN 38053
- e. Ingram Micro TLP, 3820 Micro Drive, Millington, TN 38053
- f. Envision Peripherals, 47490 Seabridge Drive, Fremont, CA 94538

4. PERSONS INVOLVED IN PURCHASES: Frank Warner (plaintiff)

5. PRICE:

- a. Not available
- b. \$119.99
- c. \$119.99
- d. \$86.50
- e. \$222.50
- f. Not available

6. TAXES/FEES: The standard sales tax was applied to the purchases of the computer monitors.

7. BUNDLE: None of the computer monitors were purchased as part of a bundle or system.

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8. **WARRANTIES:** None other than any standard manufacturers' warranties.
9. **PURPOSE of PURCHASE:** Mr. Warner purchased certain of the computer monitors for personal use and certain ones for use in connection with his business and not for resale.

See also CRT000104-105 and CRT000565-571.

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SAMSUNG EXHIBIT B22

PLAINTIFF ALBERT SIDNEY CRIGLER

1. CRT PRODUCT:

- a. Sharp television – S/N: 653205
- b. Gateway computer monitor – S/N: 7033364

2. DATE OF PURCHASE:

- a. 2004
- b. Not available.

3. LOCATION of PURCHASE:

- a. Target
- b. Gateway

4. PERSONS INVOLVED IN PURCHASE: Albert Sidney Crigler (plaintiff)

5. PRICE:

- a. Not available.
- b. Not available.

6. TAXES/FEES: The standard sales tax was applied to the purchases.

7. BUNDLE:

- a. The television was not purchased as part of a bundle or system.
- b. The computer monitor was purchased as part of a bundle.

8. WARRANTIES: None other than standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000001-08.

Produced on 9/7/11

SAMSUNG EXHIBIT B23

PLAINTIFF MARGARET SLAGLE

1. CRT PRODUCT:

- a. Sylvania television – S/N: J39420241
- b. Magnavox television – S/N: 60HZ75W

2. DATE OF PURCHASE:

- a. 11/26/04
- b. 12/04

3. LOCATION of PURCHASE:

- a. Radio Shack, South Burlington, VT
- b. Radio Shack, South Burlington, VT

4. PERSONS INVOLVED IN PURCHASES: Margaret Slagle (plaintiff)

5. PRICE:

- a. \$238.23 (including tax)
- b. Not available.

6. TAXES/FEEs: The standard sales tax was applied to the purchases of the televisions.

7. BUNDLE: Neither television was purchased as part of a bundle or a system.

8. WARRANTIES: None other than standard manufacturers' warranties.

9. PURPOSE of PURCHASE: Personal use.

See also CRT000174-213 and CRT000505.

Produced on 9/7/11

SAMSUNG EXHIBIT B24

PLAINTIFF JOHN LARCH

- 1. CRT PRODUCT:** Curtis Mathes television
- 2. DATE OF PURCHASE:** 6/22/04
- 3. LOCATION of PURCHASE:** K-Mart – Weirton, West Virginia
- 4. PERSONS INVOLVED IN PURCHASE:** John Larch (plaintiff)
- 5. PRICE:** \$389.99
- 6. TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
- 7. BUNDLE:** The television was not purchased as part of a bundle or system.
- 8. WARRANTIES:** John Larch purchased a “Smart Plan” warranty in connection with his purchase of the television.
- 9. PURPOSE of PURCHASE:** Personal use.

See also CRT000171-173.

Produced on 9/7/11

SAMSUNG EXHIBIT B25

PLAINTIFF BRIGID TERRY

- 1. CRT PRODUCT:** Toshiba television – S/N: 92567585
- 2. DATE OF PURCHASE:** 1997 or 1998
- 3. LOCATION of PURCHASE:** The Village – Janesville, Wisconsin
- 4. PERSONS INVOLVED IN PURCHASE:** Brigid Terry (plaintiff)
- 5. PRICE:** Not available.
- 6. TAXES/FEES:** The standard sales tax was applied to the purchase of the television.
- 7. BUNDLE:** This television was not purchased as part of a bundle or system.
- 8. WARRANTIES:** None other than any standard manufacturers' warranty.
- 9. PURPOSE of PURCHASE:** Personal use.

See also CRT000017-18, CRT000073-74, and CRT000563-564.

Produced on 9/7/11

SAMSUNG EXHIBIT A1

PLAINTIFF JERRY COOK

Mr. Cook's claims have been dismissed.

Produced on 9/7/11

SAMSUNG EXHIBIT A2

PLAINTIFF BRIAN LUSCHER

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Produced on 9/7/11

SAMSUNG EXHIBIT A3

PLAINTIFF JEFFREY FIGONE

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SAMSUNG EXHIBIT A4

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SAMSUNG EXHIBIT A5

PLAINTIFF DANA ROSS

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SAMSUNG EXHIBIT A6

PLAINTIFF STEVEN GANZ

Steven Ganz

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SAMSUNG EXHIBIT A7

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SAMSUNG EXHIBIT A8

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SAMSUNG EXHIBIT A9

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SAMSUNG EXHIBIT A10

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SAMSUNG EXHIBIT A11

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SAMSUNG EXHIBIT A12

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SAMSUNG EXHIBIT A13

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SAMSUNG EXHIBIT A14

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SAMSUNG EXHIBIT A15

PLAINTIFF CHARLES JENKINS

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SAMSUNG EXHIBIT A16

PLAINTIFF DANIEL HERGERT

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SAMSUNG EXHIBIT A17

PLAINTIFF SAMUEL NASTO

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SAMSUNG EXHIBIT A18

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SAMSUNG EXHIBIT A19

PLAINTIFF GARY HANSON

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Joel Flom
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Produced on 9/7/11

SAMSUNG EXHIBIT A20

PLAINTIFF DONNA MARIE ELLINGSON

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SAMSUNG EXHIBIT A21

PLAINTIFF FRANK WARNER

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Produced on 9/7/11

SAMSUNG EXHIBIT A22

PLAINTIFF ALBERT SIDNEY CRIGLER

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Produced on 9/7/11

SAMSUNG EXHIBIT A23

PLAINTIFF MARGARET SLAGLE

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Produced on 9/7/11

SAMSUNG EXHIBIT A24

PLAINTIFF JOHN LARCH

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Produced on 9/7/11

SAMSUNG EXHIBIT A25

PLAINTIFF BRIGID TERRY

Brigid Terry
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Robert J. Gralewski, Jr.
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825 Third Avenue
New York, NY 10022

Produced on 10/4/11

SAMSUNG EXHIBIT D6 (AMENDED)

PLAINTIFF STEVEN GANZ

CRTs: Mr. Ganz does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Ganz consulted Consumer Reports prior to purchasing both CRT televisions identified in Samsung Exhibit B6. He also believes he may have reviewed advertisements for CRT products in Best Buy, Circuit City, and/or Costco circulars. Mr. Ganz does not have specific recollection of the contents of any of the advertisements he saw.

Produced on 10/4/11

SAMSUNG EXHIBIT D7 (AMENDED)

PLAINTIFF BRADY LANE COTTON

CRTs: Mr. Cotton does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Cotton does not recall reviewing any trade publications, advertisements, or news articles relating to the price or product features of CRT products during the relevant time period.

Produced on 10/4/11

SAMSUNG EXHIBIT D15 (AMENDED)

PLAINTIFF CHARLES JENKINS

CRTS: Mr. Jenkins does not believe he reviewed any trade publications, advertisements, or news articles relating to the price or product features of CRTs during the relevant time period.

CRT Products: Mr. Jenkins reviewed a Rex's Appliance advertisement for the Packard Bell computer monitor identified in Samsung Exhibit B15 in the November 26, 1997 edition of the Columbus Commercial Dispatch. Mr. Jenkins also recalls reviewing an advertisement relating to the price or product features of CRT products in a Sunday edition of the Columbus Commercial Dispatch in February 1995.

Produced on 10/4/11

SAMSUNG EXHIBIT E6 (AMENDED)

PLAINTIFF STEVEN GANZ

Mr. Ganz purchased two LCD computer monitors during the relevant period. He purchased both because they were part of a package and because the LCD monitors were smaller and he believed the price of the LCD monitors was relatively comparable to the price of CRT monitors.

Produced on 10/4/11

SAMSUNG EXHIBIT E7 (AMENDED)

PLAINTIFF BRADY LANE COTTON

Mr. Cotton did not purchase a non-CRT television or computer monitor during the relevant time period.

Produced on 10/4/11

SAMSUNG EXHIBIT E15 (AMENDED)

PLAINTIFF CHARLES JENKINS

Mr. Jenkins did not purchase a non-CRT television or computer monitor during the relevant time period.

Produced on 10/4/11

SAMSUNG EXHIBIT E30 (AMENDED)

PLAINTIFF CONRAD CARTY

Mr. Carty did not purchase a non-CRT television or computer monitor during the relevant time period.

TOSHIBA EXHIBIT A1

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF JERRY COOK

RESPONSE: The following individuals participated in the preparation of these responses:

Jerry and Debra Cook
4125 Cook Road
Bentonville, AR 72712

Charles M. Kester
Kester Law Firm
P.O. Box 184
Fayetteville, AR 72702-0184

TOSHIBA EXHIBIT A2

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF BRIAN LUSCHER

RESPONSE: The following individuals participated in the preparation of these responses:

Brian Luscher
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Chandler, AZ 85226

Thomas G. Stack
Ryley, Carlock & Applewhite
One North Central Avenue, Suite 1200
Phoenix, AZ 85004-4417

TOSHIBA EXHIBIT A3

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF JEFFREY FIGONE

RESPONSE: The following individuals participated in the preparation of these responses:

Jeffrey Figone
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Joseph M. Patane
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TOSHIBA EXHIBIT A4

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF CARMEN GONZALEZ

RESPONSE: The following individuals participated in the preparation of these responses:

Carmen Gonzalez
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San Jose, CA 94318

Marwa Elzankaly
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TOSHIBA EXHIBIT A5

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF DANA ROSS

RESPONSE: The following individuals participated in the preparation of these responses:

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Susan Kupfer
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San Francisco, CA 94111

TOSHIBA EXHIBIT A6

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF STEVEN GANZ

RESPONSE: The following individuals participated in the preparation of these responses:

Steven Ganz

Adam Belsky
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180 Montgomery Street, Suite 2200
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TOSHIBA EXHIBIT A7

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF BRADY LANE COTTON

RESPONSE: The following individuals participated in the preparation of these responses:

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TOSHIBA EXHIBIT A8

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF COLLEEN SOBOTKA

RESPONSE: The following individuals participated in the preparation of these responses:

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Robert G. Methvin, Jr.
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TOSHIBA EXHIBIT A9

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF DANIEL RIEBOW

RESPONSE: The following individuals participated in the preparation of these responses:

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TOSHIBA EXHIBIT A10

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF TRAVIS BURAU

RESPONSE: The following individuals participated in the preparation of these responses:

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TOSHIBA EXHIBIT A11

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF SOUTHERN OFFICE SUPPLY

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Shirla McQueen & Christine M. Larson
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TOSHIBA EXHIBIT A12

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF CHAD KLEBS

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TOSHIBA EXHIBIT A13

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF DAVID NORBY

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TOSHIBA EXHIBIT A14

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF RYAN RIZZO

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TOSHIBA EXHIBIT A15

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF CHARLES JENKINS

RESPONSE: The following individuals participated in the preparation of these responses:

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TOSHIBA EXHIBIT A16

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF DANIEL HERGERT

RESPONSE: The following individuals participated in the preparation of these responses:

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TOSHIBA EXHIBIT A17

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF SAMUEL NASTO

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Robert Gerard
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TOSHIBA EXHIBIT A18

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF CRAIG STEPHENSON

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TOSHIBA EXHIBIT A19

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF GARY HANSON

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Joel Flom
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TOSHIBA EXHIBIT A20

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF DONNA MARIE ELLINGSON

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TOSHIBA EXHIBIT A21

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF FRANK WARNER

RESPONSE: The following individuals participated in the preparation of these responses:

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TOSHIBA EXHIBIT A22

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF ALBERT SIDNEY CRIGLER

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Brent Irby & Eric Hoagland
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Vestavia Hills, AL 35216

TOSHIBA EXHIBIT A23

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF MARGARET SLAGLE

RESPONSE: The following individuals participated in the preparation of these responses:

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Mary G. Kirkpatrick
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South Burlington, VT 05401

TOSHIBA EXHIBIT A24

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF JOHN LARCH

RESPONSE: The following individuals participated in the preparation of these responses:

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Michael G. Simon
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TOSHIBA EXHIBIT A25

Interrogatory #1: IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

PLAINTIFF BRIGID TERRY

RESPONSE: The following individuals participated in the preparation of these responses:

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Seymour Mansfield
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